# EPA Registration No. 82957-3 vol. 2

## Metzger, Autumn

From:

Leanne Pruett < Leanne@PyxisRC.com>

Sent:

Thursday, November 21, 2013 8:49 AM

To:

Metzger, Autumn

Subject:

RE: 82957-2 & 82957-3 neonic labels, comment review

Thanks, Autumn!

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Thursday, November 21, 2013 8:08 AM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

Here are your stamped labels! Thanks for all your help!

Autumn Metzger Registration Division Office of Pesticide Programs U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Tuesday, November 19, 2013 3:31 PM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

No worries, Autumn!

Here it is.

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Tuesday, November 19, 2013 1:59 PM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Ok, one last comment from Venus...sorry, I did not know about this newest change/thoughts about the neonic language:

For 82957-3 on pages 2 & 7, the sub heading that reads "NON-AGRICULTURAL USES:" (under the new neonic stuff) should just be deleted since there are no "Ag" uses. So keep all the statements before, bee icon and restrictions after – just delete the sub heading. Sorry.

Autumn Metzger Registration Division Office of Pesticide Programs U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]
Sent: Tuesday, November 19, 2013 10:11 AM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn -

They should be on your Turfthor and Prothor labels (attached 'em again in case I sent you the wrong labels).

For Prothor (82957-2), restriction is on page 8, in Restrictions for Exterior Ant Application

For Turfthor (82957), the restriction is in a couple of places – in General Restrictions (pages 2 and 7), Foliar and Broadcast Restrictions (pages 4 and 9) and Application Restrictions for Soil Drench and Soil Injection (pages 5 and 10).

If you think they need to go elsewhere, or there should be more to the retriction than the sentence added ("Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon"), please let me know.

I've got a doctor's appointment this morning, so won't be back until later this afternoon, but I can make any needed changes then.

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Tuesday, November 19, 2013 9:36 AM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Leanne.

Do you want to add the Oregon restriction to both of these? If you plan to register either of these in Oregon they will require that Linden tree restriction. If you do not register in OR I can continue with these last submitted labels. Let me know today (or better yet just add the restriction if you need to and send back today).

Thanks,

Autumn Metzger Registration Division Office of Chemical Safety and Pollution Prevention, U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Thursday, November 14, 2013 4:59 PM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Shoot, Autumn!!!

I FORGOT to add in the Ensystex updated address (the registrant specifically asked me to do so).

Here are updated labels for the Protor and the Turfthor, with an updated address for Ensystex III. That's the only change on these labels. You can tell these are the updated ones, because I've got 'address update' in the electronic label name.

Sorry about that!

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Thursday, November 14, 2013 3:09 PM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

This all sounds fine. We just heard about OR yesterday, but I appreciate you sending me the letter.

Autumn Metzger Registration Division Office of Chemical Safety and Pollution Prevention, U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]
Sent: Thursday, November 14, 2013 2:40 PM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn -

Here are the updated labels for the Ensystex III Turfthor and Prothor.

I'm not sure if you are aware, but the state of Oregon has just recently indicated a label update that must be done for imidacloprid labeling – they want the statement "Do not apply this product, by any application method, to linden, basswood or other Tilia species in the State of Oregon." added to all appropriate labels. I've attached a letter from OR, indicating the need for that change (NOTE – attached letter was not sent specifically to Ensystex III, but the letter applies to all imidacloprid labels in OR. I added this statement in a couple of places to the Turfthor label, and in one place to the Prothor label.

One other note regarding the Prothor label – in your marked up label that you sent, there were several instances where statements were identified as potential Restrictions. In some cases, I made RESTRICTIONS sections, and 'corralled' all the restrictive statements in them. In other sections, it was a little unwieldy to move those statements to a 'Restrictions' section – to me, it read like doing so would impede the flow of the label, so I left those 'as is'. If you want to discuss the changes I made, please let me know, and we can set up a quick call.

Best Regards, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Tuesday, November 12, 2013 1:49 PM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi Leanne,

No problem. Thanks for the update. As per my earlier email please send me clean copies only (no tracked).

Autumn Metzger Registration Division Office of Chemical Safety and Pollution Prevention, U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Tuesday, November 12, 2013 1:19 PM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hey, Autumn -

Unfortunately, I'm not going to be able to get the final Turfthor and Prothor labels to you today. I sent them to Ensystex yesterday morning, but the reviewer is out of the office until Thursday. I should be able to get the final labels to you before the end of this week.

To make sure we're all 'on the same page', would you like me to send you the annotated/tracked label text with the corrections I've made? You can check it to see if I properly implemented the necessary changes. If I missed something, I can get that corrected, so that what I send you later this week is correct.

Best, Leanne

From: Leanne Pruett

Sent: Monday, November 11, 2013 8:36 AM

To: 'Metzger, Autumn'

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Sorry, Autumn –

I was busy working on some other projects, and had to put these labels off a bit.

I've just completed the updates to these labels, and have just sent them to the client for their review, and have told him that I need to send them to you by the end of the day tomorrow.

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Friday, November 08, 2013 2:09 PM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Leanne,

Do you have the labels completed yet? The last email you only sent the original labels from 9/25/13. Are you able to get me the revised labels by EOB Tuesday? – clean copies only (no tracked).

Autumn Metzger Registration Division Office of Chemical Safety and Pollution Prevention, U.S. EPA 703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Thursday, October 31, 2013 12:19 PM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hey, Autumn -

Here are the electronic copies of the labels for Ensystex III (both tracked and clean).

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Thursday, October 31, 2013 11:00 AM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Sure I'll be at my desk.

Autumn Metzger
Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Thursday, October 31, 2013 10:31 AM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Can we make it 11:15? Just got finished with something that took a little longer than I thought.

I can call you.

L.

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Thursday, October 31, 2013 10:13 AM

To: Leanne Pruett

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Lets do 11 am EST. Sorry I didn't attach the labels before. We can discuss the other labels generically on the call.

Registration Division
Office of Chemical Safety and Pollution Prevention, U.S. EPA
703-305-5314

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]

Sent: Thursday, October 31, 2013 9:43 AM

To: Metzger, Autumn

Subject: RE: 82957-2 & 82957-3 neonic labels, comment review

Hi, Autumn -

I'm available today from around 11 AM – 1:30 PM, then from around 3:30 PM to 5 PM (I'm in Raleigh, so that's EDT – same as you). I'm also available on Monday after 1 PM, and all day on Tuesday, also.

These two labels you mention are the Ensystex II labels (Prothor and Turfthor).

I also did updates for Ensystex IV labels (83923-1, 83923-2, 83923-3, 83923-4, 83923-5), Envincio labels (87276-4, 87276-5, 87276-6, 87276-10), Amtide labels (83851-7, 83851-8, 83851-12, 83851-13, 83851-20) and Tide Labels (84229-9, 84229-10, 84229-14, 84229-15)

Not sure if you're ready to talk about these yet or not. Maybe the changes that you'll make to the Ensystex III labels will easily translate over to the other labels.

Best, Leanne

From: Metzger, Autumn [mailto:Metzger.Autumn@epa.gov]

Sent: Thursday, October 31, 2013 9:02 AM

To: Leanne Pruett

Subject: 82957-2 & 82957-3 neonic labels, comment review

Hello Leanne,

I have some label comments for both of these. Once we saw how the "new" language looked in the context of a label it was apparent we needed to add some other statement/restrictions to make the whole thing make sense. I also made some other minor label revisions as part of the general review. I would like to set up a phone call with you today if possible to go over these. I am attaching both copies of the label with my hand-marked comments to make it easier to follow along. If you are not available today I could do Monday afternoon or Tuesday most of the day as well. This call will probably take about 40 minutes.

Statements you will need (easier to copy and paste):

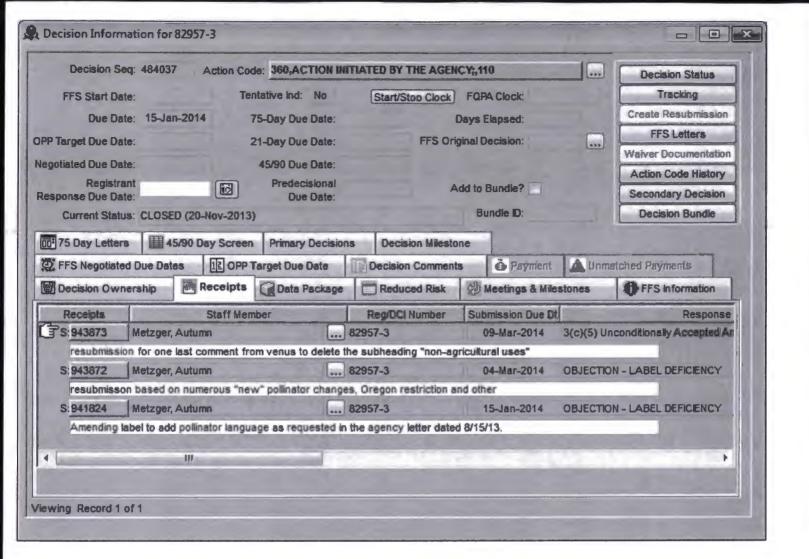
82957-3

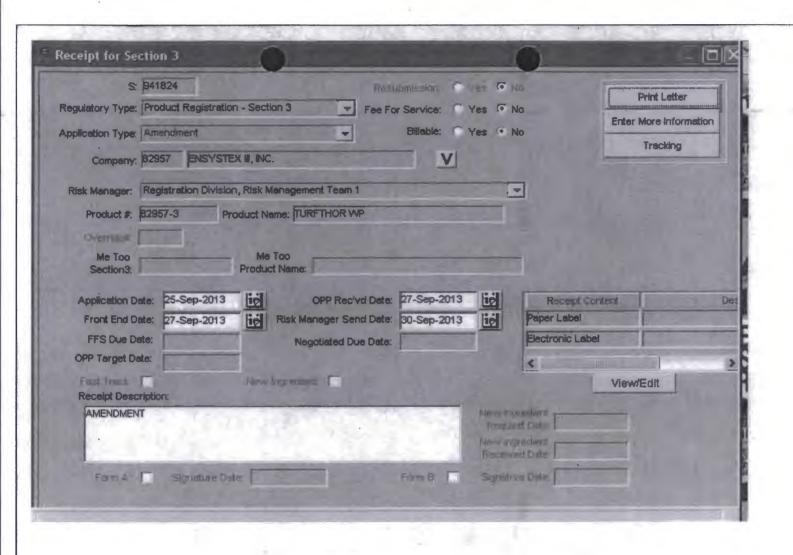
Pg 2: above "Non-Ag Uses"

See individual sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.

Pgs 4 & 9: under a section that will be "Restrictions for Foliar applications:"

You can add some sort of referral section to pages 2 new neonic stuff.







# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

September 30, 2013

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TURFTHOR WP COMPANY NAME: ENSYSTEX III, INC. OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 82957-3 EPA RECEIPT DATE: 09/27/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff Information Services Branch Information Technology & Resources Management Division

## PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

September 25, 2013

Venus Eagle (PM1) Document Processing Desk (AMEND) Office of Pesticide Programs (7505P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S. Crystal Drive Arlington, VA 22202-4501

ATTENTION: Pollinator Fast-Track Amendment

Ensystex III, Inc. - submission of label amendment to Imidacloprid products to add pollinator RE: protection language, including the following products:

- Prothor WP (EPA Reg. No. 82957-2)
- Turfthor WP (EPA Reg. No. 82957-3)

Dear Ms. Eagle,

On behalf of Ensystex III, Inc., I am submitting a series of applications to amend the registrations of the above-listed subject products, to add pollinator protection language to the product labels. The language is being added in response to Steven Bradbury's August 15th, 2013 letter regarding Pollinator Protection Labeling for Nitroguanidine Neonicotinoid Products.

In support of these label amendments, the following documents are enclosed for each product:

- 1. EPA Application Form 8570-1
- 2. One (1) copy of product label with changes tracked
- 3. Three (3) copies of product label with changes incorporated
- 4. One copy of the proposed label on CD
- 5. Certification with respect to Label Integrity

Additionally, I have enclosed a letter of authorization, allowing Pyxis to act as Ensystex III's agent with EPA.

As per Steven Bradbury' August 15, 2013 letter, these amendments qualify as non-PRIA fast track amendments. If you have any questions or concerns regarding this application for registration, or require additional information, please contact me at (253) 853-7369 or Leanne@PyxisRC.com.

Best Regards,

P. Leanne Pruett

Pyxis Regulatory Consulting

**Enclosures** 

cc: Ensystex III, Inc.

Mosse reed Instructions	en reverse before compl	eting form.		Form App	roved.	OMB No. 20	70-006	O. Approval expires 2-28-
<b>⊕EPA</b>	PA Environmental Protection Agency Weshington, DC 20480					Registrat Amendm Other		OPP Identifier Number
		Application	for Pestic	ide - Sect	ion			
1. Company/Product Nu Ensystex III, Inc /	mber 82957-3			Product Mana . Eagle	ger			posed Classification  None Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP			PM# 1					
Ensystex III, Inc. c/o Pyxis Regulat	Applicant Include ZIP Coory Consulting, Inc. W, Gig Harbor, WA		(b)(i), to:		simi	lar or identic	al in co	FIFRA Section 3(c)(3) mposition and labeling
Check II	this is a new address		Prod	uct Name				
			Section -	11				
X Amendment - Ex Resubmission in Notification - Exp	response to Agency lette	or dated	— [_ 	Final printed Agency lette "Me Too" A Other - Expla	r dete pplica	tion.	10	
			Section -	110				
, Material This Product	Will Be Peckaged In:							
Yes No Certification musical submitted	Yee No	No. per III	Yes No  ( "Yes" Peckage wgt	No. per container			ontainer Metal Plastic Glass Paper Other (S	pecify)
Label	nts Information  Container	4. Size(e) Retail C	Container		5. Loc	ention of Label On Label On Labeling ac		
. Menner in Which Leb	el is Affixed to Product	Lithograph Paper give Stendied	id	Other				
			Section -	IV				
. Contact Point /Camp	lete items directly below	for identification of	individual to	be contacted, it	nece	ssary, to proc	ess this	application.)
leme P. Leanne Pruett		Title	e jent				elephone 253-853	No. (Include Ares Code) 3-7369
	tatements I have made on t any knowlingity false of ible law.		ettechments ti					6. Date Application Received (Stamped)
. Signature	ease Pr		3. Title Agent					
6. Typed Name 6. Date				ptember 25, 2013				

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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 2, 2011

Ross Gilbert, agent for Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136<sup>th</sup> St., NW Gig Harbor, WA 98332

re: Turfthor WP, EPA Reg. # 82957-3

label amendment – container handling – master label consisting of 2 sub-labels P438582

accepted

Dear Mr. Gilbert:

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is ACCEPTABLE.

This amendment was submitted to update the container handling directions. During review the registrant explained that the product is sold in two different packages. However, each package type requires different Directions for Use. While these two packages would usually be registered as two separate products, at the registrant's request both packages will be registered under a single EPA registration number but the stamped master label consists of two sub-labels, one for each package type.

Submit two (2) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the label stamped "accepted" is enclosed for your records. If you have any questions please contact Tom Harris at (703) 308-9423 or <a href="mailto:harris.thomas@epa.gov">harris.thomas@epa.gov</a>

Sincerely yours,

Rosanna Louie-Juzwiak

Product Manager

Insecticide Rodenticide Branch Registration Division (7505C)

enclosure





# TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses\*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

\*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other ingredients:	25.0%
TOTAL:	100.0%

Each water soluble packet contains 1.6 ounces product (0.075 lbs active ingredient)

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

## STOP - Read the label before use KEEP OUT OF REACH OF CHILDREN

## CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

## ENSYSTEX III, Inc.

Favetteville, NC 28303

20110110 Turfthor WP 82957-3 Master Label containing WP sub label and WSP sub label\_EPA comments incorporateda.pdf

Mall and an extent continues and other transfer to the bank of the bank of				
Gall poison control center or doctor immediately for treatment activice.				
<ul> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>				
Do not give anything to an unconscious person.				
Take off contaminated clothing.				
Rinse skin immediately with plenty of water for 15 to 20 minutes.				
Call a poison control center or doctor for treatment advice.				
<ul> <li>Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> </ul>				
<ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>				
Call a poison control center or doctor for treatment advice.				
HOTLINE NUMBER				
ntainer or label with you when calling a poison control center or doctor int. You may also contact 1-(866)-367-8467 for emergency medical n.				
NOTE TO PHYSICIAN				

## PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

## CAUTION

Hammful If swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, syes or clothing. Avoid breathing dust or vapor. Wash thoroughly with seep and water after handling and before esting, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-elseved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyethylene,

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## **Environmental Hazards**

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly taxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and perticularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

## **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

- Do not apply more than 5 water soluble packets of TURFTHOR WP per acre per year. Do not exceed 0.4 lb. active ingredient imidacloprid per acre per year of any product containing imidacloprid.
- . Do not apply in greenhouses or nurseries.
- Not for use on buf or plants being grown for sale, for commercial seed production, or for research purposes.
- · Not for use on bearing fruit or nut trees.
- Do not apply through an imigation system,
- TURFTHOR WP is not registered for use on golf courses in the state of California.

## ACCEPTED AUG - 2 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 82957-3

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not pout concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefiliable container. Do not reuse or refili this container. Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by indineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Split: Confine II, avoid contact, isolate area and keep animate and unprotected persons away. If apili is liquid, form dike around split area and/or absorb split with absorbent meterials, such as sand, cat litter or clay. If apili is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-868-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

## **DILUTION AND MIXING OF TURFTHOR WP**

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in dissel oil or summer cancer oils.

## **APPLICATION FOR TURF PESTS**

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turtgress insect posts. TURFTHOR WP is not for use on turtgrass grown for sale (sod farms), commercial seed production or for research.

## **Application Sites**

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

## **Application Timing**

The active ingredient in TURFTHOR WP, imidecloprid, has sufficiently long-leating residual activity that applications can be made prior to egg laying by the target peat(s). Optimum control of turf peats will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/rapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is moved prior to irrigation/rainfall occurring.

## **Application Precautions and Preparations**

Keep children and pets off treated areas until spray has dried.

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, mittides, fungicides and fertilizers Follow the tabel directions of all the products mixed, making sure not to exceed the tabeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

## **Application Equipment and Methods**

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application-equipment must be used to apply TURFTHOR WP.

## **Turf Application Use Rates**

Use Rate Table for TURFTHOR WP for Turf Applications					
Use Rate	Ounces (Packets) per sq. feet	Packets per acre			
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.	4			
В	1.6 curces (1 packet) per 8,250 sq. ft	5			

## **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (0.4 lbs a.i. per acre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

## Turf Pests Grouped by Use Rates

Use Rate A: Larvae of Annual bluegrass weevil, Asistic garden beetle, Billibug, Black turfgrass statenius, Cutworms (suppression only), European chafer, European Crane Fly, Graen June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, Phyllophaga spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

### **Application Against Specific Turf Pests**

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch buge: To maximize suppression, make application prior to the hatch of the first instar nymbs.

Mole crickets: Make application prior to or during the period of peak egg hetch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for furl pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (packets per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Packets TURFTHOR WP to use = AxB. Round down to nearest integer.

example:  $(56,628 \text{ sq. feet} / 43,560 \text{ sq. feet}) \times (5 \text{ packets / acre}) = 6.5 = \text{ round down to use 8 packets}^{\circ}$ 

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

## **Maximum Applications Per Year**

Limited to one application per year for turf.

## FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soli, controls a wide range of listed insects on trees (including non-bearing first and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and finition plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vescular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

## **Application Sites**

For use on ornamental trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

## **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, mitticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a smell quantity of the mixture to ensure there is no physical or chemical incompatibility.

if necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pins or my should be applied in combination with a spreader / sticker.

## Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

## Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wat foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed up to a maximum of 5 water soluble packets per acre per year. Do not apply more than 0.4 lb. Imidacloprid per acre per year of any product containing imidacloprid.

Mixing Table for TURFTHOR WP for Foilar Applications
1.5 ounces (1 packet) per 300 gallons of water.

## Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Last beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflias.

## **Broadcast Application**

**Broadcast Application Use Rate** 

Use Rate Table for TURFTHOR WP for Broadcast Applications

#### 1.6 ounces (1 packet) per 8,250 to 11; u00 sq. ft.

## **Broadcast Application Volume and Application Method**

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To actieve optimum control, infigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lbs s.i. per acre per year).

## **Ornamental Pests Controlled by Broadcast Application**

White grub larvee such as Japanese beetle larvae, Chalers, Phyliophaga spp., Asiatic garden

## SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a hervestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vescular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pasts infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage stready caused by the pest and stress to the tree caused by the pest infestation.

## **Application Sites**

For use on omamental plants, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and privats), ornamental gardens, perks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

#### Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Amored scales (suppression), Black vine weevil larves, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (Including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvee, Whiteflies.

## Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

## Soil injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk dismeter

## Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a tow pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Eventy space injection holes around the base of the tree no more than 12 inches out from the tree

## Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

1.6 cunces (1 packet) per 24 to 48 inches of cumulative trunk diameter

## Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be edequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a pleasic vapor barrier.

## Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soll Injection for Shrubs

#### 1 packet) per 24 to 48 cumulative ft. of shrub height

## Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

#### Soil Drench for Shrubs

Soil Drench Use Rate for Shruba

Use Rate Table for TURFTHOR WP for Soil Drench for Shrube

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

### Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor berrier.

## ADDITIONAL RESTRICTIONS

Oo not apply more than 5 water soluble packets of Turfthor WP per sore per year (0.4 lbs imidacloprid per sore per year of any product containing imidacloprid).

Do not graze treated areas or use clippings from treated areas for feed or forage.

Do not irrigate to point of runoff or puddling following application.

Do not apply to waterlogged, saturated, or frozen solls since this will prevent penetration to the root zone

### IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not table, return the product at once, unopened, and the purchase price will be refunded

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex III, Inc., it is impossible for Ensystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer, and User agree to hold Ensystex (II harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. ANY warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE)
RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE
RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF
ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.







# TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses\*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

\*Not registered for this use in California

Active ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	<u>25.0%</u>
TOTAL:	100.0%

Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

## STOP - Read the label before use KEEP OUT OF REACH OF CHILDREN

## CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III, Inc.

Favetteville, NC 28303

	FIRST AID
If swallowed	Call poison control center or doctor immediately for treatment advice.
	<ul> <li>Have person sip a glass of water if able to swallow.</li> </ul>
	<ul> <li>Do not induce vamiting unless told to do so by the poison control center or doctor.</li> </ul>
	Do not give anything to an unconscious person,
If on skin or	Take off contaminated clothing.
clothing	<ul> <li>Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> </ul>
	Call a poison control center or doctor for treatment advice.
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 16 to 20 minutes.</li> </ul>
	<ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rineing eye.</li> </ul>
	Call a poison control center or doctor for treatment advice.
	HOTLINE NUMBER
	ontainer or label with you when calling a polson control center or doctor ent. You may also contact 1-(899)-397-8467 for emergency medical on.
	NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically

## PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

## CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long parts, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl nubber, nitrile rubber, neoprene rubber, natural rubber, polyethylens polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## **Environmental Hazards**

This pesticide is highly toxic to equatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment weahwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds it bees are or weeds. Do not apply the visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

## DIRECTIONS FOR USE

- It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.
- Do not apply more than 8.6 ounces (0.4 ib. s.i.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.
- Do not apply in greenhouses or nurseries.
- · Not for use on turf or plants being grown for sale, for commercial seed production, or for research purposes.
- . Not for use on bearing fruit or nut trees.
- . Do not apply through an irrigation system.

TURFTHOR WP is not registered for use on golf courses in the state of California.

## STORAGE AND DISPUSAL

Do not contaminate water, food or feed by storage or disposal.

Peaticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recep. Shake for 10 seconds. Pour rinsets into application equipment or a mix tank or store rinsets for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and teep animals and unprotected persons away. If spill is liquid, form dike around apill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

## **DILUTION AND MIXING OF TURFTHOR WP**

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

Do not use kitchen utensits to mix or apply this product. Use equipment dedicated to posticide measurement and application.

## **APPLICATION FOR TURF PESTS**

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turfgrase insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

### **Application Sites**

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, ptaygrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

## **Application Timing**

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-leating residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

## **Application Precautions and Preparations**

Keep children and pets off treeted areas until spray has dried.

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompetibility.

## **Application Equipment and Methods**

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly celibrated application equipment must be used to apply TURFTHOR WP

## **Turf Application Use Rates**

Use Rate Table for TURFTHOR WP for Turf Applications					
Use Rate	Ounces per acre	Teaspoons per 1,000 sq. feet			
A	6.4⇒6.6 ounces per acre	3:::4 level teaspoons per 1,000 sq ft.			
В	8.6 ounces per acre	4 level teaspoons per 1,000 eq. ft.			

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 oz. TURFTHOR WP

3 level teaspoons = 1 tablespoon

## **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (8.6 ounces Turfthor WP per acre per year; 0.4 lb. imidactoprid per scre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dozing will not result in an application rate in excess of the maximum label rate (8.6 ounces Turfthor WP per scre per year, 0.4 lb. imidactoprid per acre per year).

## **Turf Pests Grouped by Use Rates**

Use Rate A: Lervee of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass atsonius, Cutworms (suppression only), European chafer, European Crane Fly,

Green June beetle, Japa. \_\_\_\_ beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

### **Application Against Specific Turf Pests**

Grube, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hetch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 eq. ft. /1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target peet(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Ounces TURFTHOR WP to use = A X B X 0.05

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

## FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of tisted insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active logradient into the plant.

Translocation of soil directed applications made to woody stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

## **Application Sites**

For use on ornamental trees (including non-bearing fruit and nut trees), ahrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawn, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

## **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, mitteldes, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horiculture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pine or ky should be applied in combination with a spreader / sticker.

## Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

## Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly well foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations, Reepply as needed up to a maximum of 0.4 lb. a.l. per scre per year.

Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
50	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 az, TURFTHOR WP

3 level teaspoons = 1 tablespoon

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including alm and viburnum leaf beetles), Leathoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawily larvae, Thrips (suppression), Whiteflies.

## **Broadcast Application**

**Broadcast Application Use Rate** 

## Use Rate Table for TURFTHOR WP for Broadcast Applications

6.4⇒8.6 ounces per acre / 3⇒4 level teaspoons per 1,000 sq. ft.

#### **Broadcast Application Volume and Application Method**

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lb. a.i. per acre per year).

## **Ornamental Pests Controlled by Broadcast Application**

White grub lervae such as Japanese bestle lervee, Chefere, Phyllophega spp., Asiatic garden beetle. Oriental beetle

## SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL **PESTS**

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of fisted insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is resilized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be trenslocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 80 days. Optimum levels of control are realized when applications are performed sufficiently prior to enticipated pasts infeatations.

Applications to trees for the control of existing borer infestistions may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

### **Application Sites**

For use on omemental plants trees (including non-bearing fruit and nut trees), shrubs, evergreens (numerical plants lives (including non-locating fruit and nut trees), shruber evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

## **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fartilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chamical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

## Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weekl larvee, Emerald ash borer, Eucalyptus longhomed borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leef beetles (including elm and viburnum leaf beetles), Leafhoppers (Including glassy-winged sharpshooter), Leef miners, Mesiphugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawily larvae, Soft scales, Thrips (suppression only), White orub larvae, White

## Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

## Soil injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

Q,7 to 1.4 level teaspoons per inch of trunk diameter (DBH)\*/

1 to 2 ounces per 30 oursulative inches of trunk diameter (DBH)\*

\*OBH = Diameter at Breast Height measured at 4.5 feet above the ground

## Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after

Grid Injection: Evenly space holds on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Sasal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tre

## Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0,7 to 1.4 level teaspoons per inch of trunk diameter (DBH) \*/

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)\* nd at 4.5 feet above the o

### er at Oreast Height mer Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

### Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shruba

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs 0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height

1 to 2 ounces per 30 cumulative feet of shrub height

## Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treatment area for 7 to 10 days after treatment.

## Soil Drench for Shrubs

Soil Drench Use Rate for Shrube

Use Rate Table for TURFTHOR WP for Soil Drench for Shrube 0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height

1 to 2 ounces per 30 cumulative feet of shrub height

### Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any benier to the movement of the solution into the soil such as a plastic vapor barrier.

## ADDITIONAL RESTRICTIONS

Do not apply more than 8.6 ounces of Turithor WP per sore per year (0.4 lb. imidscloprid per acre per year of any product containing imidacloprid.)

Do not graze treated areas or use dippings from treated areas for feed or forage.

Do not irrigate to the point of runoff or puddling following application.

Do not apply to waterlogged, saturated, or frozen soils since this will prevent penetration to the root zone

## IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other feators beyond the control of Ensystex III, Inc., it is impossible for Ensystex III to etiminate ell risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in secondance with the Directions for Use when used in secondance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR APPLICABLE LAW, ENSYSTEX III MARCES NOW ANRANTIES OF MERICIPAN TABILITY OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR MIPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormed conditions or under conditions not under conditions in the conditions of the con reasonably foreseesble by (or beyond the control of) seller or Ensystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex III shall not be flable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.

[EPA approval data]

Scan's got cut off, this is all we have but important to save.



RE: Additional revisions for Ensystex III Turfthor WP EPA Reg. No. 82957-3

Ross Gilbert to: Thomas Harris

01/10/2011 02:26 PM

Tom,

I have created a master label with both sub labels and incorporated all the comments you detail below. PDF attached.

Best wishes for the New Year,

ROSS

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

----Original Message----

From: harris.thomas@epamail.epa.gov [mailto:harris.thomas@epamail.epa.gov]

Sent: Monday, January 03, 2011 10:29 AM

To: Ross Gilbert

Subject: Additional revisions for Ensystex III Turfthor WP EPA Reg. No.

82957-3

Ross,

Happy New Year! Sorry this took so long to get back to you. I try to keep revisions going once we start; just got buried by a few PRIA deadlines.

Attached is another round of comments. I noticed that you had missed a couple of my previous corrections. Also, I sent this on for PM review and they noted additional corrections. This should be it once these are done. Just email me back a revised label.

IMPORTANT: The two sub-labels should be combined into a single "master" label. I've done that in the marked up versions attached (WSP first then WP). It is this master label that will be stamped. You can then subset the master by using either one of the two pieces when you label the container for sale. Not sure how you handle the state registration; I'll leave that up to you and each state.

EPA/OCSPP/OPP/RD/IRB voice: (703) 308-9423 fax: (703) 308-0029

harris.thomas@epa.gov

visit http://www.epa.gov/pesticides

From:

Ross Gilbert <Ross@PyxisRC.com>

To:

Thomas Harris/DC/USEPA/US@EPA

Date:

12/03/2010 01:51 PM

Subject: RE: Create two sub-labels under one master label for Ensystex

III Turfthor WP EPA Reg. No. 82957-3

Tom,

I've made the changes and attach the pdf files as requested.

Please let me know if there is anything else we need to cover.

Best,

Ross

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

From: harris.thomas@epamail.epa.gov [
mailto:harris.thomas@epamail.epa.gov]
Sent: Monday, November 22, 2010 3:03 PM
To: Ross Gilbert
Subject: RE: Create two sub-labels under one master label for Ensystex III
Turfthor WP EPA Reg. No. 82957-3

Ross,

Getting there. A few more changes. Please revise the label and send me a text pdf of the label (you sent .doc last time).

for those). Change header to read: "Ornamental Application to Control Ants (except fire, Pharoah, harvester, carpenter ants)".

- 4) p. 3, Additional Restrictions: State first item in terms of packets: "Do not apply more than 5 water soluble packets of Turthor WP per acre per year (0.4 lbs imidacloprid ...."
- 5) p. 4-6, footer: Change the footer for pages 3-6 to read "WP label" instead of "WSP label".
- 6) p. 4, DFU: typo on 0.4. Change bolded limit to read: "Do not apply more than 8.6 ounces (0.4 lb a.i.) of TURFTHOR WP per acre per year ...."

Tom Harris
EPA/OCSPP/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit http://www.epa.gov/pesticides

From: Ross Gilbert <Ross@PyxisRC.com>

To: Thomas Harris/DC/USEPA/US@EPA

Date: 11/09/2010 01:12 PM

Subject: RE: Create two sub-labels under one master label for Ensystex III Turfthor WP EPA Reg. No. 82957-3

Tom,

I attach the Ensystex Turfthor WP with the edits you specified in your attachment.

As for point 7) in your general observations below, you raise an interesting point! We looked at a number of other, similar imidacloprid labels, including Bayer Merit 75 WP (EPA Reg. No. 432-1314 - also attached) which was the label upon which the original registration was based, and could not find a clarified rate for this type of application, beyond the general maximum use rate.

Thanks and regards,

I've attached a marked-up copy of the 10/18/10 version of 82957-3 (both a) a print image that you can simply print and it will show comments and b) a "live" version of the mark-up which is larger type but you'll have to open all the comment boxes manually).

>>>> Please edit as indicated and email me a revised version.

print this version: (See attached file: 082957-00003.20101018.20101018 Turfthor WP PRN 2007-4 label notification\_sub labels per Thomas Harris email 20101015.EPA COMMENTS.PRINT IMAGE.pdf)

"live" version:

(See

attached file:
082957-00003.20101018.20101018 Turfthor WP PRN 2007-4 label notification\_sub
labels per Thomas Harris email 20101015.EPA
COMMENTS.pdf)

A few general observations:

- 1) You can delete pages 1-4 since they are the old combined WSP and WP label that we're trying to clarify.
- 2) Somewhere on each page include something like the text I've written on the bottom of each page to indicate which label that page goes with and what the master label is made of. Master label is made up of two sub-labels (see why I said it's easier if these are two different reg # products!).
- 3) A lot of the edits have to do with EPA's push to clarify mandatory vs advisory labeling. While there are legitimate times to use them, you should be careful with the words "general", "recommend", "avoid", "including", "should", et al since these indicate advisory text (replace them when text is supposed to be mandatory).
  - 4) Add the size of each WSP (both in terms of product and a.i.) under ingredient statement on the WSP label.
  - 5) Rewrite mixing directions for WSP so they are given in terms of # of water soluble packets per something.
  - 6) For WP mixing directions, the tsp directions are ok but add something similar for larger volumes in ounces of product.
  - 7) I'm not sure how to express limits for soil inject and soil drench (i.e. how to equate these with 0.4 lb a.i./acre/year limit). Any ideas?

Tom Harris

Cc:

Mike Kerlogg <Mike@PyxisRC.com>

Date:

10/18/2010 04:56 PM

Subject: RE: Create two sub-labels under one master label for Ensystex III Turfthor WP EPA Reg. No. 82957-3

Dear Mr Harris,

Thanks for your e-mail, and your understanding.

I have done as you suggested in your e-mail below, and I attach the pdf document you requested.

Please could you indicate whether the Master label plus the 2 sub labels you suggested are acceptable?

Thanks and best regards,

Ross

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

----Original Message---From: harris.thomas@epamail.epa.gov [
mailto:harris.thomas@epamail.epa.gov]
Sent: Friday, October 15, 2010 10:00 AM
To: Ross Gilbert
Cc: Eagle.Venus@epamail.epa.gov
Subject: Create two sub-labels under one master label for Ensystex III
Turfthor WP EPA Reg. No. 82957-3

Mr. Gilbert,

Thanks for the explanation. Now it makes sense, although I'm sure I'm not the last regulatory reviewer to be confused by the current label since the directions are very different for the two package types.

We normally require products with the same formula but different use directions due to packaging (eg. WSP and WP) to be registered as two separate products. However, OPP will allow you to continue to track the two packages

master label containing two sub-labels and I'll continue processing this under the current action. You do not need to submit any other paperwork or to send paper copies via the mail.

Tom Harris
EPA/OPPTS/OPP/RD/IRB
voice: (703) 308-9423
fax: (703) 308-0029
harris.thomas@epa.gov
visit http://www.epa.gov/pesticides

From: Ross Gilbert <Ross@PyxisRC.com>

To: Thomas Harris/DC/USEPA/US@EPA

Date: 09/02/2010 04:52 PM

Subject: Ensystex III Turfthor WP EPA Reg. No. 82957-3

Ensystex III Turfthor WP EPA Reg. No. 82957-3

Dear Mr Harris,

Thank you for your letter dated 8/16/10 regarding the above product and a notification we submitted dated 3/4/2010.

Having read your comments, I'd like to offer the following clarification:

- Turfthor WP is packaged in 2 distinct ways:
  - a. In water soluble packets (WSP); and
- b. As a wetable powder (non-WSP).

  Both the WSP and non-WSP are in turn packaged in a HDPE plastic bottles (to which the disposal language relates).

  The packaging arrangements were included as an addendum to the application form 8570-1, and I attach a copy for ease of reference.
- 2. The label contains mixing directions for both WSP and non-WSP. For example, please see the second page of the submitted label under the heading "Turf Application Use Rates" where you can see that reference is made to both packet quantities for WSP in the first table and ounces/teaspoons for non-WSP in the second table. There is also alternative language under the heading.

does. If you would rike to discuss this further, please contact me by e-mail or at the telephone number below.

Thanks and regards,

Ross

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

(See attached file: 20100304 application supplement for 8570-1.doc)
[attachment "20101018 Turfthor WP PRN 2007-4 label notification\_sub labels per
Thomas Harris email 20101015.pdf" deleted by Thomas Harris/DC/USEPA/US]
[attachment "20101105 Turfthor WP label revisions per Thomas Harris email
20101101.doc" deleted by Thomas Harris/DC/USEPA/US] [attachment
"432-1314 Merit 75 WP Insecticide PPLS label dated 20090501.pdf" deleted by
Thomas Harris/DC/USEPA/US] [attachment "20101203 Turfthor WP WP Sub Label.pdf"
deleted by Thomas Harris/DC/USEPA/US] [attachment "20101203 Turfthor WP WSP
sub label.pdf"
deleted by Thomas Harris/DC/USEPA/US]

20110110 Turfthor WP 82957-3 Master Label containing WP sub label and WSP sub label\_EPA comments incorporated a.pdf



## Ensystex III Turfthor WP EPA Reg. No. 82957-3

Ross Gilbert o Thomas Harris

09/02/2010 04:52 PM

## **Ensystex III Turfthor WP EPA Reg. No. 82957-3**

Dear Mr Harris,

Thank you for your letter dated 8/16/10 regarding the above product and a notification we submitted dated 3/4/2010 .

Having read your comments, I'd like to offer the following clarification:

- 1. Turfthor WP is packaged in 2 distinct ways:
  - a. In water soluble packets (WSP); and
  - b. As a wetable powder (non-WSP).

Both the WSP and non-WSP are in turn packaged in a HDPE plastic bottles (to which the disposal language relates).

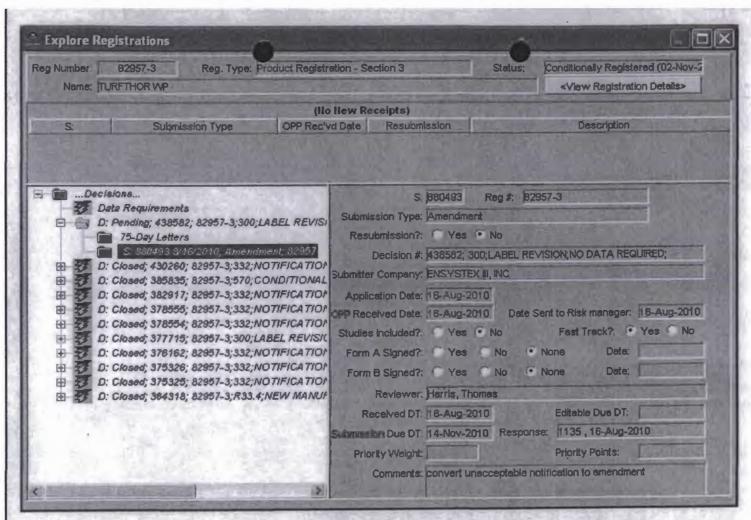
The packaging arrangements were included as an addendum to the application form 8570-1, and I attach a copy for ease of reference.

- 2. The label contains mixing directions for both WSP and non-WSP. For example, please see the second page of the submitted label under the heading "Turf Application Use Rates" where you can see that reference is made to both packet quantities for WSP in the first table and ounces/teaspoons for non-WSP in the second table. There is also alternative language under the heading, "Calculating Amounts of Turfthor WP to Mix for Turf Pests", and throughout the label there are 2 tables under each section: one for WSP and one for non-WSP purposes.
- 3. Although the master label submitted to EPA contains both language for WSP and no-WSP forms of the product, the language on the final label for WSP and non-WSP products is specific to the type of product contained within i.e. the non-WSP product does not contain the WSP language and vice versa. This removes the risk that the user would be misled into attempting to open the WSP in order to measure amounts of product.

I hope this clarifies matters somewhat, and explains why the label reads as it does. If you would like to discuss this further, please contact me by e-mail or at the telephone number below.

Thanks and regards,

Ross



O. y (bai/A)
max on fart



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

AUG 24

8/16/2010

, ,

irral sent dated

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

4/2/10

- that way is remark.

Ross Gilbert
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Label Notification for Pesticide Registration Notices 2007-4

Dear Mr. Gilbert:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 3/4/2010 for the product EPA Reg. # 82957-3.

Turfthor WP. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested does not clearly fall within the scope of PRN 98-10 and will require additional administrative review of the related files. A summary of our findings include:

Note: All these corrections are based on the assumption that this is a dry formulation packed in water soluble packages. If that is not correct then we need to discuss the labeling further.

1. Container Disposal Text Since this is a dry product packed in water soluble packages the concept of rinsing the container with water is not appropriate. Unused water soluble packages still in the foil outer pouch should be disposed of per "pesticide disposal" directions. Replace the container handling text with the following:

"Container handling: Nonrefillable container. Do not reuse or refill this container. Offer empty outer container and empty foil outer pouch for recycling if available or dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities."

Front Panel, product name
 Strongly suggested: Since this is a Water Soluble Package, not a Wettable Powder
 type product it would be clearer to rename the product "Turfthor WSP" instead of
 "Turfthor WP".

3. Front panel, ingredients Follow the ingredients list with a description of the weight of each water soluble

packet, eg. a 20 lb box could say "contains 20 water soluble packets packaged in a foil outer pouch each containing 1 lb product."

- 4. Directions for Use, Dilution and Mixing
  Delete the second paragraph that states "to mix, measure out the required amount
  ...." Keep the current third paragraph which correctly states how to drop the
  required number of unopened water soluble packets into the spray tank.
- 5. Directions for Use, Calculating Amounts of Turfthor WP to Mix for Turf Pests Rewrite the current text which refers to teaspons per 1000 square feet. The user is only able to use quantities which are pre-measured into the water soluble packets. The user should not open the water soluble packets to measure other quantities of product.

Therefore, the RD has determined that this action is denied and will be further processed as an amendment and our records have been updated accordingly.

Please submit a revised label correcting the issue identified above. If possible, please include a text .pdf of the revised label on CD-ROM along with your application. If you have any questions please do not hesitate to call me.

Sincerely yours,

Thomas C. Harris

**Biologist** 

Insecticide Rodenticide Branch Registration Division (7505P)

Harris.Thomas@epa.gov

(703) 308-9423

# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL					
EPA Registration #	Date Submitted to EPA	Electronic file name			
82957-3	September 25, 2013	082957-00003.20130925.Turfthor WP bee			

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

P. Gran At-	9-25-2013
Signature	Date
P. Leanne Pruett	
Name (typed)	
Agent	
Title •	

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. Is authorized to act as agent for Ensylex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

a Stackley, Nothing Public

If you have any questions, please do not hesitate to contact me.

Sincerely

David Nimocks Chairman

PUBLIC

AND

cc: Pyxis Regulatory Consulting, inc.

Notary

## PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332 Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

March 4, 2010

## COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. - Turfthor WP (EPA Reg. No. 82957-3)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Ms. Eagle,

On behalf of Ensystex III, Inc. please find the enclosed label notification revising the container disposal instructions for Prothor WP per PRN 2007-4.

In support of this notification submission, we submit the following documents:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the Turfthor WP labeling with changes tracked
- 3. One (1) copy of the Turfthor WP labeling with changes incorporated
- 4. Certification with Respect to Label Integrity
- 5. One (1) copy of the Turfthor WP labeling on CD
- 6. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex III, Inc

Messe reed instructions o	n reverse before comple	ting form.			Form App	rovec	. OMB No	. 2070-006	50. Approvel expires 2-28
SEPA	Environmenta	United States Environmental Protection Agency Weekington, DC 20460				<b>✓</b>	Regist Amend Other		OPP Identifier Number
		Application	n for Pe	sticide	- Sect	ion	1		
. Company/Product Numi 82957-3	ber			EPA Pro	oduct Mane	ger		3. P	roposed Classification
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP			PA	РМ#					
. Name and Address of A Ensysytex III, Inc. c/o Pyxls Regulatory Con 4110 136th St. NW Gig Harbor, WA 98332		ode)	to E	i(i), my : :PA Re	product is	s sim	ilar or ide	ntical in co	r FIFRA Section 3(c)(3) emposition and labeling
Check if th	is is a new educess			-	Name _	-			
			Sectio	<u>n - 11</u>					
Amendment - Explo	sponse to Agency letter	deted			inal printed gency lette Me Too" A other - Expla	r det pplica	ed ition.	nee to	
. Material Thie Product W	Unit Packaging		Section Weter Solu	sble Paol	raging		2. Type o	of Container	
Yes	Yes No	No. per	No No		No. per		Pleetic Glass	Pleetic	
Certification must submitted	Unit Packaging wgt.		Peckage wgt container see attached see attach		ed		Other (S	see attached	
Location of Net Content	Information Container	4. Size(s) Reta	see attach	∍d	6	Loc	On Label	abel Direction	
Manner in Which Label i	s Affixed to Product	Uthogra Paper of Stencilo	aph plued ed	[	Other				
			Section	- IV					
Contact Point (Complet	e items directly below fo	or identification	of individual	to be o	ontected, if	nece	ssery, to p	process this	application.)
me oss Gilbert			fitte Agent						No. (Include Aree Code) 53-7369
I certify that the etat I acknowledge that a both under applicable	ements I have made on ny knowlingity false or i n law.	Certificat this form and o misleading stat	il attachmen	ts theret e punish	o are true, able by find	eccu or in	rate and or	omplete. nt or	6. Date Application Received (Stamped)
Signature Albert			3, Title Agent						
Typed Name Ross Gilbert	· 1 · · · · · · · · · · · · · · · · · ·	5	. Date	3/4/1	0				

EPA Form 8570-1 (Rev. 3-94) Previous editions ere obsolete.

White - EPA File Copy (original)

# Application for Registration (cont'd)

RE: Turfthor WP 82957-3

Section III

Turfthor WP will be packaged in Water Soluble Packaging (WSP) and HDPE plastic bottles

Water Soluble Packaging (WSP):

1.6 oz. (4, 16, or 88 per container) - water-soluble packets will be contained within HDPE plastic bottles.

Plastic Container Packaging (Non-WSP):

Ensystex III, Inc. may also package Turfthor WP in 16 oz. and 32 oz. HDPE plastic bottles.

Ross Gilbert

Pyxis Regulatory Consulting, Inc.

Date

# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL					
EPA Registration #	Date Submitted to EPA	Electronic file name			
829573	March 4, 2010	082957-00003.20100304.PRN 2007-4 lbl notification.pdf			

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Albert	3/4/10
Signature	Date
Ross Gilbert	
Name (typed)	
Agent	
Title	

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

Stackley, Notany Public

If you have any questions, please do not hesitate to contact me.

Sincerely

David Nimocks Chairman

PUBLIC

cc: Pyxis Regulatory Consulting, Inc.

Notary



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 2 4 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Michael Kellogg Etigra LLC Ensystex 1U, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136<sup>th</sup> Street, NW Gig Harbor, WA 98332

Subject:

Submission of Storage Stability and Corrosion Characteristics Studies

Turfthor WP

EPA Reg. No. 82957-3

Your Submission date, October 25, 2007

Dear Mr. Kellogg:

The Agency has received and reviewed the requested above mentioned studies. The studies are acceptable and your requirement for the registration of the above product is complete. Thank you for your prompt completion of the data for this section 3 registration. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel

Insecticide-Rodenticide Branch Registration Division 7505P DATE OUT:

SUBJECT:

STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS

(830.6320) REVIEW

ACCELERATED STUDY []; ONE YEAR STUDY [];

OVER 1 YEAR STUDY [X] MP[] EP[X] EUP[]

DP BARCODE No.: 346330 REG. No.: 82957-3 MRID No(s):472652-1 DECISION No.: 385835

PRODUCT NAME: TURFTHOR WP

COMPANY: ENSYTEX III. INC.

FROM:

William Herald / Reviewer

**Product Chemistry Team** 

, 8Pm 8/26/08 Technical Review Branch/RD (7505P)

TO:

Venus Eagle / Dani Daniel, PM Team 1

Insecticide-Rodenticide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):

[X] ACCEPTABLE

[] UNACCEPTABLE\*

[] UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [] NOT SATISFIED

**CORROSION CHRACTERISTICS (830.6320):** 

[X] ACCEPTABLE

[] UNACCEPTABLE\*

[] UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [] NOT SATISFIED

\* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations:

#### **II. STUDY SUMMARY**

# A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES [X] Yes [ ] No

#### **B. PRODUCT INFORMATION**

Active Ingredient(s): Imidacloprid
Label claim(s) Nominal concentration(s) (%): 75.0%Imidacloprid
Initial concentration(s) of the Al(s) (%) used in the study: 75.17% imidacloprid
Lower certified limits (%) based on Al % in the study: 72.9149% imidacloprid

#### C. EXPERIMENTAL PARAMETERS

Temperature: "ambient temperature" Humidity: Indicate % (If provided)

Duration of study: [] 1 year; [X] over 1 year

Type of container: transparent, rectangular shaped, "Water Soluble Bags"

Analysis at Intervals: [X] 0 (initial);

[X] 3 months; [X] 6 months [X] 9 months; [X] 12 months

[X] Over 12 months

#### D. ANALYTICAL METHOD

Method	DETECTOR
High Pressure Liquid chromatography (HPLC)	• UV/VIS 252nm

#### E. RESULTS

The report shows that following the initial characterization of the Al:

- 1) After storage at ambient temperature for periods of 3, 6, 9, 12, and 18 months the Al% remained well within the required statutory parameters (40 CFR § 158.175).
- 2) There were no reported impurities during any point of the 18 month study.
- 3) There were no reported adverse reactions involving the product with the transparent, rectangular shaped, "Water Soluble Bag" container. The report recites that visual observations were made of the container, and there were no reported remarkable changes in the shape or color. The bag container developed no cracks, perforations, darkening or leakage at the seam at no time during the 18 month study period.
- 4) The report recites that study was validated for linearity, standard accuracy and precision



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

hur E

October 30, 2007

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ENSYSTEX III, INC. 4110 136TH ST., NW GIG HARBOR, WA 98332-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 29-OCT-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

## PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332 Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

October 25, 2007

#### COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex III Inc. – Turfthor WP (82957-3)
Submission of Storage Stability and Corrosion Characteristic Study per the Agency letter dated
November 2, 2006

Dear Ms. Eagle,

On behalf of Ensystex III Inc. and in response to the Agency letter dated November 2, 2006, please find the enclosed storage stability and corrosion characteristics study for Turfthor WP (EPA Reg. No. 82957-3).

In support of this submission, please find the enclosed:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. Product Specific Chemistry Data (3 copies):

47265201 Volume 1

830.6317; 830.6320

Vohra, Y., Storage Stability and Corrosion Characteristics of Imidathor 75 WP.

Please note: Imidathor 75 WP and Turfthor WP are the same product. Ensystex III changed the product name from Imidathor 75 WP to Turfthor WP just prior to submitting the application for registration.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

**Enclosures** 

cc: David Nimocks; Ensystex III, Inc.

<b>⇔</b> EPA	Environment Was	United States al Protect hington, DC 2	tion Ager	тсу		1	_	ration dment	OPP Identifier Number
		Applicat	ion for P	esticide	- Sec	tion			
1. Company/Product Numb 82957-3	190			2. EPA Pro	duct Man	ager			Proposed Classification  None Restricts
<ol> <li>Company/Product (Name Ensystex III, Inc. / Tur</li> </ol>	Z			PM# 01					,
5. Name and Address of A Ensystex III, Inc. c/o Pyxis Regulatory O 4110 136th St. NW Gig Harbor. WA 98332 Check II th	consulting, Inc.	Code)			No	s sim	ilar or ide	ntical in o	th FIFRA Section 3(c)(3) composition and labeling
			Secti	on - II					
Notification - Explain  Explanation: Use addition  Submission of storage	onel page(s) if necesse	ıry. (For secti		Oti	ency lett le Too" A her - Expl	ain be	low.	Novembe	er 2, 2006.
			Section	n - III					
1. Material This Product W	ill Be Packaged In:								
Child-Resistent Peckeging Yes No Certification must	Unit Packaging Yes No If "Yes" Unit Packaging wgt	No. per container		1	No. per		2. Type o	f Containe  Metal Plestic Glass Paper Other (	
3. Location of Net Contents	Information Container	4. Size(s) Re	tail Containe	- 1		5. Loo	"] On Label	shel Directi	
3. Menner in Which Label is		Lithog	greph glued siled		Other				
			Sectio	n - IV					
, Contact Point (Complete	items directly below	for identification	on of individu	al to be con	tected, h	neces	esary, to p	rocess this	s application.)
leme Michael Kellogg			Title Agent						ne No. (Include Area Colle) 3-7369
I certify that the state i acknowledge that er both under applicable	y knowlingly false or		all attachme						6. Date Application Received (Stamped)
. Signature	Ma		3. Tide Agent						

5. Date

PA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

4. Typed Name

Michael Kellogg

White - EPA File Copy (original)

fellow - Applicant Copy



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

AUG 2 4 2007

Michael Kellogg Agent for Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332

SUBJECT: Application for Pesticide Notification - Add Golf Course Restriction in CA

Turfthor WP

EPA Reg. No. 82957-3

Application Dated July 19, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703\305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader

Registration Division (7505P)

Office of Pesticide Programs



### PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

July 19, 2007

#### COURIER DELIVERY

John Hebert (PM 7)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

ANT FLATION

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)

Notification of Minor Label Revisions per PRN 98-10 to Facilitate Registration in the State of California

Dear Mr. Hebert,

On behalf of Ensystex III, Inc, please find the enclosed notification of minor label revisions for Turfthor WP (EPA Reg. No. 82957-3). California specific language (restricting use on golf courses in California) is being added to facilitate registration of Turfthor WP in the state of California.

In support of this notification, please find the following:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the Turfthor WP label with changes tracked
- 3. One (1) copy of the Turfthor WP label with changes incorporated
- 4. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

**Enclosures** 

cc: David Nimocks; Ensystex III, Inc.

NOTIFICATION

AUG 24 2007.

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

Stackley, Nothing Public

If you have any questions, please do not hesitate to contact me.

Sincerely

David Nimocks Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary



# TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses\*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

"Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN

## CAUTION

(PRECAUCION AL USUARIO: SI usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit waw.for-thor.com.

**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID		
if swallowed	Call poison control center or doctor immediately for treatment advice.	
	Have person sip a glass of water if able to swallow.	
	<ul> <li>Do not induce vomiting unless told to do so by the poleon control center or doctor.</li> </ul>	
	Do not give anything to an unconscious person.	
If on skin or	Take off contaminated clothing.	
clothing	<ul> <li>Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> </ul>	
	<ul> <li>Call a poison control center or doctor for treatment advice.</li> </ul>	
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> </ul>	
	<ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>	
	Call a polson control center or doctor for treatment advice.	
	HOTLINE NUMBER	
	ontainer or label with you when calling a polson control center or doctor ent. You may also contact 1-(866)-367-8467 for emergency medical on.	
	NOTE TO PHYSICIAN	

# No specific antidote is available. Treat the patient symptomatically. PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

## CAUTION

Harmful if availowed, Inhaled or absorbed through skin. Causes eye Inflation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must weer long-elseved shirt and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl nubber, nitrile rubber, neoprene nubber, natural nubber, polyvinylchloride (PVC) or viton and shose plus accks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Befety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **Environmental Hazards**

This pesticide is highly toxic to equatic invertebrates. Do not apply directly to water, or to ereas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

#### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per sore per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

TURFTHOR WP is not registered for use on golf courses in the state of California.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not prevent appliage. Do not prevent appliage of the concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a tocked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sankery landfill or by incineration, or if allowed by state and local authorities, by burning, if burned, stay out of emoke.

In Case of Splii: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If splii is liquid, form dike around splii area and/or absorbert materials, such as sand, cal litter or clay. If splii is dry powder only, sweep material into a suitable container. Place demaged package in a holding container and identify contents. Contact Ensystex III at 1-866-387-8467 or Chemireo at 1-800-424-9300 for any assistance.

#### DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become well at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wat hands or gloves or in a rough manner can cause them to tests. Reseal the outer container if water soluble packets are left inside after opening.

To mix, measure out the required emount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agiletor operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of egitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tenks also containing products that contain boron or free chlorine. The packet materiat may react with the boron or chlorine to form a non-vaste soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer soray oils.

### **APPLICATION FOR TURF PESTS**

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgress insect pests. TURFTHOR WP is not for use on turfgress grown for sale (sod farms), commercial seed production or for research.

#### **Application Site**

Permitted sites include but are not limited to lewns, grounds and landscapes at and/or around residences including multi-unit, commerciat, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cameteries, alroofs and parks.

#### **Application Timing**

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-tasting residual activity that applications can be made prior to egg laying by the target post(s). Optimum control of turf peats will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the elte or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your erea (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is moved prior to irrigation/rainfall occurring.

#### **Application Precautions and Preparations**

Keep children and pets off treated areas until spray has dried.

Application should not be made to turl that is frozen, waterlogged or is esturated with water. Turl in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, mitticides, fungicides and fertilitzers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ansure there is no physical or chemical incompatibility.

#### **Application Equipment and Mathods**

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

#### **Turf Application Use Rates**

Use R	tate Table for TURFTHOR WP for Turf Applications
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 6,250 to 11,000 sq. ft.
8	1.6 ounces (1 packet) per 8,250 sq. ft.

Use Rate	Table for	TURFTHOR V	<b>AP</b> for Tur	f Applications

Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet
Α,	6.4=8.6 ounces per ecre / 3=>4 level tesspoons per 1,000 sq. ft
В	8.6 ounces per acre / 4 level tesepoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

#### **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than Intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

#### **Turf Pests Grouped by Use Rates**

Use Rate A: Larvae of Annual bluegrass weevil, Asiatio garden beetle, Billbug, Black turfgrass staemius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, Phyllophage app., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

#### **Application Recommendations Against Specific Turf Peets**

Grubs, bilibugs, annual bluegrass weevil and European crane fly: Oplimum control is obtained when application is made prior to egg hetch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak agg hetch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### Calculating Amounts of TURFTHOR WP to Mix for Turf Peats

To mix and apply any amount of TURFTHOR WP for turf pasts based on number of square feet, determine:

A = # of Square fact of area to be treated / 1000 (for example 5,500 eq. ft. /1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turi peets as follows:

Tesspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turl pasts based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,580 (1 acre = 43,560 aq. ft.)

8 = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

# FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broedcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants the will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research surposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingradient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

#### **Application Sites**

For use on ornamental plants including but not limited to trees (including non-bearing fruit and ruit trees), shrubs, evergreens, flowers, ground covers, bedding plants and follage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawris, grounds, golf courses (not in California) and interior plantscapes at ant/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cameteries, sirports and parks, public and private wooded and forested areas.

#### **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (subt be your Cooperative Extension Service) to determine appropriate application timing.

#### Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such autroly, pine or my should be applied in combination with a spreader / sticker.

#### **Ornamental Application to Control Anta**

TURFTHOR WP can be used to indirectly cont.c. crts.when applied to control aphids, scale insects, mestybuge and other sucking insects on diname, tale thereby limiting the amount of honeydew available.

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#### Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wat foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high peat populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications 1.6 ounces (1 packet) per 300 gallons of water

Mixing Table for TURFTHOR WP for Foliar Applications		
Gallons Water	Level Teaspoons TURFTHOR WP	
2.5	0.25	
5.0	0.50	
10.0	1.00	
25.0	2.60	
50.0	5.00	
100.0	10 00	

<sup>1</sup> level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

### Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (Including elm and viburnum leaf beetles), Leafhoppers (Including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawily larvee, Thrips (suppression), Whiteflies.

#### **Broadcast Application**

**Broadcast Application Use Rate** 

Use Rate Table for TURFTHOR WP for Broadcast Applications 1.6 ounces (1 packet) per 6,250 to 11,000 sq. ft.

Use Rate Table for TURFTHOR WP for Broadcast Applications

6.4⇒8.6 ounces per acre / 3⇒4 level teaspoons per 1,000 sq. ft.

#### **Broadcast Application Volume and Application Method**

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 equare feet. To achieve optimum cortrol, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

#### **Ornamental Pests Controlled by Broadcast Application**

White grub isrvae such as Japanese beetle larvse, Chafers, Phyllophage spp., Asiatic garden beetle, Oriental beetle

#### SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soll drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perannial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research progress. research purpos

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen-containing facilitizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or eround residences including multi-unit, commercial, office and shopping buildings and complexes, necreational areas, playgrounds, athletic fields, cemeterias, airports and parks, public and private wooded and forested areas.

#### **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

### Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flalheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leef beetles (including elm and viburnum leef beetles), Leefhoppers (including glassy-winged sharpshooter), Leef miners, Meetybugs, Pine tip moth larvae, Paytids, Royal pairn bugs, Sewfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies

#### Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York Soil Injection Use Rate for Trees

> Use Rate Table for TURFTHOR WP for Soil Injection for Trees 1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

#### Use Rate Table for TURFTHOR WP for Soil injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

#### Soil injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basel Injection: Eventy space injection holes around the base of the tree no more than 12 inches out from the tree.

#### Soil Dranch for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees 1.5 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

#### Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) / 1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

#### Soil Orench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any partier to the movement of the solution into the soil such as a plastic vapor berrier.

#### Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs 1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub.height

Use Rate Table for TURFTHOR WP for Soil injection for Shrubs 0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height

1 to 2 ounces per 30 cumulative feet of shrub height

#### Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water datermined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated erea for 7 to 10 days after treatment.

#### Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs 1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs 0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height

1 to 2 ounces per 30 oursulative fact of shrub height

#### Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be edequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

#### **ATTENTION**

Do not graze treated areas or use dippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

#### IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Discience of Warranties and Limitations of Liability before buying or Lain, this product. If the jerms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex III, inc., it is impossible for Ensystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agreed to hold Ensystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTES: To the exter' conjustent with applicable laws. Seller warrants that this product conforms to the chertical cargination on the label and is resionably fit for the purposes stated on the Directions for Use when used in providence with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH

<sup>3</sup> level teaspoons = 1 tablesooon

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APPLICABLE LAW, ENSYSTEX III, MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex III, Inc., and buyer assumes the risk of any such use.

assumes the risk of any such use.

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This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.

Revised 07/07



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Michael Kellogg Ensystex III, Inc. e/o Pyxis Regulatory Consulting. Inc. 4110 136'th St. N.W. Gig Harbor, WA 98332

APR 23 2007

Dear Mr. Kellogg:

Subject:

Labeling Amendment: Revisions to Directions for Use

Turfthor WP

EPA Registration No. 82957-3 Date Submitted: March 22, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide. Fungicide, and Rodenticide Act, as amended, is acceptable with the following provision:

1. Within the DISCLAIMER OF WARRANTIES section of the label, revise the sentence "ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY..." to read "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY..."

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-(415.)

Sincerely.

Venus Eagle

Product Manager (01)

Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure



# TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN

## CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

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	FIRST AID
if swallowed	Cell poison control certier or doctor immediately for treatment advice     Have person sip a glass of water if able to swallow.
	<ul> <li>Do not induce vamiling unless told to do so by the polsor control center or doctor.</li> </ul>
	Do not give anything to an unconscious person
If on skin or	Take off contaminated clothing.
clothing	Rinse skin immediately with plenty of water for 15 to 20 minutes.
	Call a poison control center or doctor for treatment advice.
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 18 to 20 minutes.</li> </ul>
	<ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
	Call a poison control center or doctor for treatment advice
	HOTLINE NUMBER
	ontainer or label with you when calling a poison control center or doctor ant. You may also contact 1-(866)-367-8467 for emergency medical on
	NOTE TO PHYSICIAN
At a series in the series of t	a qualishin. Treat the network symptomytically

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

## CAUTION

Harmful if swallowed, inhaled or absorbed through stim. Causes eye unitation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water efter handling and before setting, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wast long-sleeved start and long pants, chemical resistant gloves made of any waterproof material such as barrier laminate, busyt nubber, nitrille rubber, neoprene nubber, natural nubber, polyethylene, polyethylene, polyethylene, and shoes plus socius (PPE). Follow manufacturar's instructions for cleaning/maintaining PPE, if there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, thewing gum, using tobacco or using the toilst. Remove clothing immediately if pesticide gets inside. Then week thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **Environmental Hazards**

This pesticide is highly toxic to equatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment witshwaters.

This product is highly toxic to been exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

#### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 6.6 ounces (0.04 (bs.) of TURFTHOR WP per scre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or gress grown for commercial seed production

Not for use on bearing fruit or nut trees

Do not apply through an intigation system.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container:

Pesticide Disposal: Wester resulting from the use of this product may be disposed of on site or at an approved waste disposel facility.

Container Disposal: Triple rinse (or equivelent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill; Confine R, evoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or day. If spill is dry powder only, sweep material into a suitable container. Place demaged package in a holding container and identify containts. Contact Ensystex III at 1-886-367-8467 or Chemtrec at 1-800-424-9300 for any assistance

#### DILUTION AND MIXING OF TURETHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Hendling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are furly dissolved depends on the degree of egitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFYHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet meterial may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in dissel oil or summer. spray oils

#### APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiling turigrass insect pests. TURFTHOR WP is not for use on turigrass grown for sale (sod famis), commercial seed production or for research.

#### **Application Sites**

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, eirports and parks.

#### **Application Timing**

The active ingredient in TURFTHOR WP, imidecloprid, has sufficiently long-testing residual activity that applications can be made prior to egg taying by the target pest(a). Optimum control of turi pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thetch and down into the underlying soil. Applications can be timed based on past experiences at the elte or in the erea, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optimum control is achieved if irrigation or reinfall occurs within 24 hours after application. Uniformity of application may be adversely affected if buff is moved prior to irrigation/reinfall

#### **Application Precautions and Preparations**

Keep children and pets off treated areas until spray has dried.

Application should not be made to turif that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

#### Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a sprey of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly celibrated application equipment must be used to apply TURFTHOR.

#### **Turf Application Use Rates**

Use R	ate Table for TURFTHOR WP for Turf Applications
Use Rate	Dunces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 pecket) per 8,250 to 11,000 sq. ft.
8	1,6 ounces (1 packet) per 8,250 sq. ft.

Use R	ate Table for TURFTHOR WP for Turl Applications
Use Rate	Ounces per acre / Teaspoons pér 1,000 sq. feet

A	6.4x 6 ounces per ecre / 3m4 level tesspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoone per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

#### **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under doeing will not result in an application rate in excess of the maximum label rate.

#### Turf Pests Grouped by Use Rates

Use Rate A: Levise of Annual bluegrass weevil, Asistic garden beetle, Bilibup, Black furfgrass steenkas, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japenese beetle, Northern mesked chafer, Oriental beetle, Phyllophage app., Southern mesked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

### Application Recommendations Against Specific Turf Pests

Grubs, bilibugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg helch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for furl pasts based on number of square

A = # of Square feet of eres to be treeted / 1000 (for example 5,500 sq. ft. /1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the larger pest(s) from the Use Rate Table. If treeting for more than one type of pest, select the highest

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Tesepoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turl pasts based on number of acres.

A = # of scree of area to be treated = equare feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target post(s) from the Use Rate Table. If treating for more than one type of peet, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pasts as follows:

Ounces TURFTHOR WP to use # A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application

#### FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage,plants, ground covers and interfor plantscapes. Non-bearing trees ere peraminal plants that yill no produce a harvestable apriouthzal commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for eals, fruit, rust or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to articipated pasts infestations.

#### Application Sites

For use on onamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornemental gardens, parks, lewns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, sirports and parks, public and private wooded and forested areas.

#### Application Preparation

TURFTHOR VIP can be mired with other insecticides, mitioldes, fungloides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the lebeled application rate of any individual product in the mixture. Any tenic mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pasts. Applications to plants with hard to wel foliage such as holly, pine or ivy should be applied in nbination with a spreader / sticker.

#### Ornamental Application to Control Ants

TURPTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, meetybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew svallable.

Foliar Application Volumes and Application Metho

Establish quantity of water necessary to uniformly well foliage. Mix required amount of TURF7HOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications 1 6 ounces (1 packet) per 300 gallons of water

Mixing Table for TURFTHOR WP for Foliar Applications Gallone Water					
Galione Hater	Level Teespoons TURFTHOR WP				
2.5	0.25				
5.0	0.50				
*0.0	1.00				
25.0	2.50				
50.0	5.00				
100.0	10.00				

1 level tesspoon TURETHOR WP # 1.4 grams TURETHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leef beetles (Including elm and viburnum leef beetles), Leefnoppers (including glassy-winged sharpshooter), Masiybugs, Peylids, Sawfly larvee, Thrips (suppression), Whitefles.

**Broadcast Application** 

**Broadcast Application Use Rate** 

Use Rate Table for TURFTHOR WP for Broadcast Applications 1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.

Use Rate Table for TURFTHOR WP for Broadcast Applications

6.4:::6.6 ounces per acre / 3:::4 level (esepoons per 1,000 sg. ft.

**Broadcast Application Volume and Application Method** 

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, larigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an eree smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in axcess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle lervae, Chafers, Phyliophaga spp., Asiatic garden beetle, Oriental beetle

#### SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-beering fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-beering trees are parantal splants that will not produce a hervestable septicultural commodity within the next 12 months. TURFTHOR WP is not for use up plants being grown for sale, fruit, nut or commercial seed production or for research correspond. erch purposes

TURFTHOR WP is a systemic insecticide meening it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently oner to enticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

#### **Application Sites**

For use on ornemental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public end private), ornamental gardens, perts, tewns, grounds, golf courses and interior plantscapes at and/or around realdences including muttl-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cameteries, sirports and parks, public and private wooded and forested areas.

#### Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products misad, making sure not to exceed the labeled application rate of any individual product in the misture. Any tank misture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your eres (such as your Cooperative Extension Service) to determine appropriate application liming.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil levee, Emerald ash borer, Eucalyptus longhomed borer, Flatheaded borers (including bronze birth borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Lasfingpers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine to moth larvae, Psyllids, Royal paim bugs, Sawfly lervae, Soft scales, Thrips (suppression only), White grub tarvae, Whitefiles

Soil Injection for Tre.

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soll Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees 1.8 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Use Rate Table for TURFTHOR WP for Soll Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /

1 to 2 ounces per 30 cumulative inches of trunk clameter (DBH) Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water datermined to be adequate for the treatment to be adequately disparsed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree

Soil Drench for Trees

Soil Dranch Lise Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees 1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Use Rate Table for TURFTHOR WP for Soil Dranch for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /

1 to 2 ounces per 30 cumulative inches of trunk diemeter (DBH)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 equiere fiest around the bass of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nessau and Suffolk Counties of New York Soil Injection Use Rate for Shrubs

> Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs 1.6 purpose (1 packet) per 24 to 48 cumulative ft. of shrub height

> Use Rate Table for TURFTHOR WP for Soil injection for Shrubs 0.7 to 1.4 level tasepoons TURFTHOR WP per fool of shrub height/

1 to 2 ounces per 30 cumulative feet of shrub height

Soil injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making minimum of 4 injection holes per shrub. For optimum control, maintain a high level of a moleture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Solt Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs 1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs 0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height 1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the emount of water determined to be edequate for the solution to be edequately dispersed. Apply solution at a rate of no less than 10 paillons per 1000 equere feet around the base of the shrub. If present, remove any ben'ier to the movement of the solution into the soil such as a plastic vapor ban'ier.

#### ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of Irrigetion water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

#### IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sals, Disclaimer of Warrenties and Limitations of Liability before buying or using this product if the terms are not ecceptable, resum the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex III, Inc., it is impossible for Ensystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Suyer and User, and Suyer and User agree to hold Ensystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is resonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES

5/5

OF MERCHANTABILITY OR OF FITNESS FOR A PART. IR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION. PURCHASE OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or Impleed, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under canditions not reasonably foreseeable by for beyond the control of seller or Ensystex Iti, Inc., and buyer assumes the risk of any such use

OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.

Revised 03/07



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

C. O- 89A

April 4, 2007

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MICHAEL KELLOGG
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TURFTHOR WP COMPANY NAME: ENSYSTEX III, INC.

EPA FILE SYMBOL: 82957-3 EPA RECEIPT DATE: 03/23/07

SUBJECT: RECEIPT OF AMENDMENT

**DEAR REGISTRANT:** 

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

2 wrice

Front End Processing Staff

Information Services Branch

Information Technology & Resources Management Division

## PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332 Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

March 22, 2007

#### COURIER DELIVERY

John Hebert (PM 7)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE:

Ensystex III, Inc. - Turfthor WP (EPA Reg. No. 82957-3)

Submission of Amended Label

Dear Mr. Hebert,

On behalf of Ensystex III, Inc, please find the enclosed label amendment adding use directions for product NOT packaged in water-soluble packaging (WSP). With Ensystex III's application for registration dated January 24, 2006, Ensystex submitted two labels, one containing use directions for product packaged in WSP and the other with use directions for non-WSP packaged product. The Agency approved the Turfthor WP registration with Notice of Conditional Registration dated November 2, 2006 however, only the labeling containing use directions for product packaged in WSP was included with the registration notice. Therefore, Ensystex III has incorporated the non-WSP language into the Agency approved (WSP) label for Turfthor WP [this same approach was requested by the Agency for the approval of Ensystex III's Prothor WP product (EPA Reg. No. 82957-2)].

In support of this label amendment, please find the following:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the Turfthor WP label with changes tracked
- 3. Five (5) copies of the Turfthor WP label with changes incorporated
- 4. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex III believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely.

Michael Kellog

Enclosures

cc: David Nimocks; Ensystex III, Inc.

Please read instructions on	reverse before comp	leting form.		Form Appro	oved. OMB	No. 2070-00	60. Approvel expires 2-28	
PEPA Environmental Protection Washington, DC 204				Registrati  Amendment Other		OPP Identifier Number		
		Application	on for Pestici	de - Secti	on I			
1. Company/Product Numb 82957-3	100		2. EPA J. Heb	Product Manag	jer	1 -	Proposed Classification  None Restricted	
6. Company/Product (Name Ensystex III, Inc. / Tur			PM#					
5. Name end Address of Ap Ensystex III, Inc. c/o Pyxis Regulatory Co 4110 136th St. NW Gig Harbor. WA 98332 Check If thi		Code)	(b)(i), n to: EPA F		similar or i	dentical in d	th FIFRA Section 3(c)(3) composition and labeling	
			Section - I	1				
Amendment - Explain Resubmission in results Notification - Explain Explanation: Use addition	ponse to Agency lette			Final printed is Agency letter "Me Too" Ap Other - Explain	dated plication.	sonse to		
submitted with this am action qualifies as a Fa Pesticide Registration	ast Track amendm	ent and is no		sticide Regis				
, Material This Product Wi	l Be Packaged In:							
Yes No Certification must			Weter Soluble Po	No Plastic Glass				
		A Circle Bea	see attached	see attached		Label Discort		
Location of Net Contents  Label	ontainer	4. Size(s) Hat	Retail Container  See attached  5. Location of Label Directions  On Label On Labeling accompanying product					
. Manner in Which Lebel is	Affixed to Product	✓ Uthogs Paper Stencil	raph glued ed	Other				
			Section - IV	1				
Contact Point (Complete	items directly below	for identification			ecessery, to	process this	application.)	
lame Michael Kellogg							ne No, (include Area Code) 53-7369	
I certify that the state I acknowledge that an both under applicable	y knowlingily false or	Certificate this form and misleading state	all attachments the	reto are true, a shable by fine	courate and or imprisonn	complete,	6. Date Application Received (Stamped)	
Signature  Minhal Holland		8	3. Title Agent					
Typed Name	10		5. Date				1	
Michael Kellogg			2/2-1-	_			1	

3/22/27 Date

# Application for Registration (cont'd)

RE: Turfthor WP

Section III

Turfthor WP will be packaged in Water Soluble Packaging (WSP) and HDPE plastic bottles

Water Soluble Packaging (WSP):

1.6 oz. (4, 16, or 88 per container) - water-soluble packets will be contained within HDPE plastic bottles.

Plastic Container Packaging (Non-WSP):

Ensystex III, Inc. will also package Turfthor WP in 16 oz. and 32 oz. HDPE plastic bottles.

Michael Kellogg

Pyxis Regulatory Consulting, Inc.

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email <u>david@ensystex.com</u>

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

a Stackley, Notary Publis

If you have any questions, please do not hesitate to contact me.

Sincerely.

David Nimocks Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Michael Kellogg, Agent Pyxis Regulatory Consulting, Inc. 4110 136 St. NW Gig Harbor, WA 98332 MAR 2 2007

SUBJECT:

Application for Pesticide Notification (PRN 98-10)

Request Alternate Brand Name "Arborthor WP"

EPA Reg. No.82957-3

Application Dated January 10, 2007

Dear: Mr. Kellogg,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 01/10/2007 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader

Registration Division (7505P)

Office of Pesticide Programs

Please read instructions of	reverse before comp	leting rorm.		Form Ap	DIOVE	. Ohn No.	2070-006	O. Approval expires 2-28-	
<b>ŞEPA</b>		United States Onmental Protection Agency Weshington, DC 20460			1	- 011107		OPP Identifier Number	
		Applicati	on for Pestici	de - Sec	tion	1			
1. Company/Product Numb 82957-3	100		2. EPA I	Product Men	reger		3. Pr	3. Proposed Classification  None Restricted	
4. Company/Product (Nam Ensystex III, Inc. / Tui	•		PM# 1						
5. Name and Address of A Ensystex III, Inc. c/o Pyxis Regulatory C 4110 136th St. NW Gig Harbor. WA 98332 Check If the	onsulting, Inc.	Cade)	(b)(i), m to: EPA R	eg. No	is sim	ilar or iden	itical in co	FIFRA Section 3(c)(3) mposition and labeling	
Amendment - Explain Resubmission in red  Notification - Explain	ponse to Agency lette	or deted	— []		ter det Applica	rtion.	se to		
labeling or the confident false statement to EPA. this product may be in vi	I further understand olation of FIFRA and	that if this noti	ification is not cons	stent with the action and	he ten	ms of PR N	lotice 98-1	0 and 40 CFR 152.46,	
Child-Resistant Packaging	Unit Packaging		Water Soluble Pa	akaaina		2. Type of	Container		
Yes No	Yes		Yes No			Metal Plestic Glese			
* Certification must be submitted			If "Yes" No. per Package wgt container				Peper Other (S	pecify)	
			5. Location of Label Directions On Label On Labeling accompanying product						
6. Manner in Which Label i	Affixed to Product	Uthog Paper Steno	reph glued iled	Other	_				
			Section - I\						
1. Contact Point /Complet	items directly below	for identification	on of individual to be	contacted,	if nece	essary, to p	rocess this	application.)	
Name Michael Kellogg			Title Agent				Telephone No. (Include Aree Code) (253) 853-7369		
	aments I have made or ny knowlingily false or n law.		all attachments the					6. Date Application Reuslysed (Stomped)	
2. Signature minhal palage			3. Title Agent			- t- t-	E Paris		
4. Typed Neme Michael Kellogg			5. Date				741	C	

## PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

January 10, 2007

#### **COURIER DELIVERY**

Venus Eagle (PM1)
Document Processing Desk (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3) Notification of an Alternate Brand Name per PRN 98-10

Dear Ms. Eagle,

On behalf of Ensystex III, Inc., please find the enclosed notification of an alternate brand name for Turfthor WP (EPA Reg. No. 82957-3). The alternate brand name is "Arborthor WP".

In support of this notification, please find the following:

- 1. Application for Pesticide Registration (EPA Form 8570-1)
- 2. One (1) copy of the Arborthor WP label with changes tracked.
- 3. One (1) copy of the Arborthor WP label with changes incorporated
- 4. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Regards,

Michael Kellogg

**Enclosures** 

cc: David Nimocks, Ensystex III, Inc.



For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active ingredient:	By WL
Imidacioprid	76.0%
Other Ingredients:	·····
TOTAL:	100.0%

Keep water soluble packets in outer container until immediate use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP - Read the label before use KEEP OUT OF REACH OF CHILDREN

### CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que le efiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID				
If awallowed	Call police central center or declar immediately for tridstmen advice.			
	· Hore person sip a glass of water If able to predien.			
	<ul> <li>Do not indees varieting unless tald to do so by the potent central center or deplor.</li> </ul>			
	. Do not give enything to an unconscious person,			
if on skin or clothing	Take off contaminated clothing.			
	<ul> <li>Rises side introducely with planty of value for 16 to 20 minutes.</li> </ul>			
	- Call a poison control conter or deuter for treatment advice.			
If in eyes	<ul> <li>Hold eye open and stees slowly and gardly with water for 15 to 20 minutes.</li> </ul>			
	<ul> <li>Remove contact lenses, if present, efter the first 6 minutes than continue rinning eye.</li> </ul>			
	<ul> <li>Cult a polean central center or dealer for treatment advice.</li> </ul>			
	HOTLINE NUMBER			

#### NOTE TO PHYSICIAN

# PRECAUTIONARY STATEMENTS

Hexarde to Humana and Damestic Animala.

#### DIRECTIONS FOR USE

Deleted: TURPTHOR

Not for use on beating full or out trees.

Deleted: TURFTHOR

#### STORAGE AND DISPOSAL

ter, tood or feed by storage or disposel.

Pasticide Starage: Keep out of resoft of children and animals. Stars in original containers only. Stars in a cool (suc not balent heading (30°F)), dry place and evoid excess heat. Hendle end upon ucolainer in a monner to as to prevent spitiage. Do not put contained or disks material into food or drink containers. Praferably store in a located put contained or disks material into food or drink containers.

Exposure to molthure or exposative handling of weter soluble packets can cause there to break. Store water soluble packets in original container preferably in a looked area. Do not out the writer soluble packets when opening certainer.

Pesitative Disposat: Weater seculting from the use of this product may be disposed of on alter or at an approved weater disposal facility.

Container Disposat: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or perceive and dispose of in a sentingy leaded or by insideration, or if allowed by table and local sub-ories, by burning. If burned, step out of streke.

in Case of Spill: Confine it, evoid contact, isolate area and keep enimals and unprotected persons every. If spill is liquid, form disc encount spill rices entire selects spill with elacoriset materials, such as sand, as fitter or day. If spill is display, sweep material into a suitable centainer. Place demaged package in a holding container and ideatily contains. Contact Ensystex III at 1-800-307-9497 or Chemires at 1-800-424-9300 for any assistance.

#### DILUTION AND MIXING OF ARBORTHOR WP

Each ARRORTHOR WP outer container contains a number of clear water soluble pectads. Do not allow the pactads to become set at any time before putting them into a spray tank at the time of intended mixing. Handling the packats with wet hands or glower or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

once opening.

To mis, open the outer container and remove the required number of unopened packate needed for the galline amount of soution to be missed. Drug the required number of packate into the sprey tank as it is being filled with whether with the against expensing. The elapsed time until the packates are skilly dissolved depends on the degree of agitation and the temperature of the weight with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for they packate to completely dissolve.

ind using ARCRITICE WP species in tanks also containing products that contain boron or obtained. The packet material may reach with this boron or obtained in from a non-reside disc compound instead of dispositing into the veter. However chloristade water use to

#### **APPLICATION FOR TURF PESTS**

ARROSTHOR WP controls or suppresses a wide range of soil inhabiling larteress insert peels ARROSTHOR WP is not for use on larteress grown for sele (sed farms), commercial seed production of to research.

Application Sites

Permitted ettes instaled but are not limited to lewns, grounds and landscapes at enviror are
residences including musti-unit, commercial, office and chopping buildings and complex
recreational areas, playgrounds, athletic fields, golf courses, cometeries, sirports and parks

#### **Application Timing**

The active ingredient in-ARBORTHOR VP, indeedopris, her sylficterity into-bedien residual activity that applications can be made prior to agg issing by the larget past(a). Optimize control of turn past will be solvieved when application is wade prior to agg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thisteh and down into the underlying self. Applications can be timed based on past experiences at this alle or in the area, current results or said monitoring/trapping or other methods.

seesessy, censult resources in hartfulfure in your area (such as your Cooperative dansion Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optionary control is achieved if irrigation or rainfall occurs within 24 hours after applicable. Uniformity of application may be adversely affected if turf is moved prior to irrigation/raint

#### **Application Presautions and Preparations**

Keep children and pets off treated cross until opray too chief.

Application should not be made to curf that is frazen, waterlagged or is caturated with water.

Turf in this constition will not allow the nemessary vertical distribution of the active ingredient
down hist the soft.

ASSESSMENT NOT can be private with other transitions. Districts And facilities. Production and the latest describing and facilities and facilities and facilities are applications rich of any instricted product in the emblace. Any text indicate that has not been tasked before should be tasked before fall code use by first indicate to sensel in the population of exhibitions to sensell quantity of the oxides to sensell the tasked before fall code use by first indicate a small quantity of the oxides to sensell the task of population of exhibition to remaining the population of exhibition to remaining the population of exhibition to remaining the population of the population of exhibition to remain the population of exhibition to remain the population of the popu

#### Application Equipment and Methods

Apply the indicated errount <u>ARROSTHOR</u> WP mixed in a volume of water sufficient to assequently distribute the active ingredient to the target great(s). Apply <u>ARROSTHOR</u> WP solution as a sprey of uniform, coarse droptets at a pressure few enough to eliminate drift from the target area. Property calibrated application equipment must be used to apply <u>ARROSTHOR</u> WP.

### **Turf Application Use Rates**

Use Re	to Table for ARSORTHOR WP for Turf Applications						
Use Rate	Ouroes (Packets) per 1,000 sq. feet						
A CO	1.6 ourses (1 packet) per 8,260 to 11,000 eq. 8.						
MARLES EL	1.6 osmoss (1 pecket) per 8,250 sq. ft.						

#### **Turf Application Volumes**

The colonidated without distribution to the profit of the profit of motion of motion as been as the management sheet rate to encounter. On not exceed the inhabitation that offer by sperging analysis in on rates a register than intensity delice. It into extremely after the first distribution such tender during will not receive in an application rate to encount of the management based rate.

#### **Turf Pests Grouped by Use Rates**

Use Risto & Larreis of Annual Magness weard, Asistic gerden beste, Birclip, Black furigrass steenhar, Catedrars (suppression only), European disafer, European Crone Fly, Girson June beste, Japanese beste, Northern missed chafer, Crissical beste, Phyllighlege app, Bouthern mested chafer, and the Catedrary Commission only), Mote Cristate

Application Recommendations Against Specific Turf Poets

Grubs, Militorge, comunic bissegrace versers and European arone By: Optimum control is obtained when septimized in made prior to egy helph.

Chinesh bugg: To maximize suppression, make application prior to the nation of the first ineter symphs.

the erickets: Make application prior to or during the period of peak agg Indah. Aguly an addition in conjunction with <u>ARCATICATION</u>, W.F. J. edge, S. Scan, Parcetty Are Jirstend, and meeting at the force of application.

#### FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

ARBORTHOR WP, scaled to foliage and broadcast on the soil, operiod, a wide range of insects on trees (including non-bearing first and rust trees), strubs, evergreess. However, foliage plants, ground oover, and interior plantscapes. Non-bearing trees are personnel plants that tell not produce a harvestable agricultural commodity within the next 12 months. 4830RTHOR WP is not for use on plants being grown for sele, fruit, rust or commercial seed production or for

ARRORTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up this the body of the plant. This means optimum vacuus system two the roots up also the soon of the paint. The means operation effectiveness of <u>ARBORTICER WP</u> is realized when ARBORTICE WP is series on on opera or growing person of the pient from which it can be translocated to other parts of the plant. Combining <u>ARBORTICER</u> WP with a natropen constanting festitizer may accelerate or otherwise enhance the uptake of the early englection into the plant.

Transionation of soil director applications made to weakly stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to enfoldering peets infectations.

#### **Application Sites**

Per use on premental plants including but not limited to trees (including non-bearing fruit on nut-bear), -brevbe, -evergreene, -llowers, -ground-covers, -bodding -plants-and-foliogo-plants and-foliogo-plants and-foliogo-plants and-foliogo-plants are not inmited to landscapes, increas (polidis and private) ornamental gardens, parts, lannes, grounds, golf outeres and interior plantacopes at another around residences including multi-unit, commercies, effice and shopping furificings are completed, remedional strees, plaggrounds, achietos feldes, get outrees, cernotaries, alreports and parks, public and private wooded and forested strees.

ARROTTHOR IVP, see Jrs. tribed, with other Josepholes, mileides, Individes, Juscides and Jedicers, Follow Jos Jean Aradions, et al. In products, mixed, making, sure and to avesed the jaqueed application rate of any individual product in the mixers. Any texts mixed that has not been tested before a should be leaded before fail celled use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult recourage in hericulture in your area (such as your Coope Extension Service) to determine appropriate application timing.

#### Foliar Application

Foliar application of ARECRITHOR WP offers local systemic activity against bread posts apparations to place with first to tak holidge such as holy just to key mount as application of active.

Ornamental Application to Control Anta

ARRORTHOR WP can be used to indirectly control sets when applied to control aphids, code insects, meetings and other sucking insects on omenmulate thereby limiting the amount of hereby controlleds.

#### Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly well foliage. Mix required amount of 
ARROSTHOR WP (from the battle below) in that quantity of water. Begin treatments prior to 
a tablishment of high pool populations. Reapply as needed.

Mixing Table to ABJORTHOR WP for Yolker Applications

1 6 ounces (1 peaket) per 300 gallons of water.

Ornamental Peats Controlled by Foliar Applications

Adelgids, Aphids, Jopanese testics, Lace bugs, Leef bestics (including elm and viburnum lost bestics). Leefingeport (finducting glassy-visuade sherpshooter), Madybugs, Payllids, Gomfy serves, Thries (suppressent), Vibilaties.

### Broadcast Application-----

Broadcast Application Use Rate Vine Made Teldle for ASSOSTINGS WF for Broadcast App

#### 1.6 ounces (1 packet) per 8,250 to 11,000 sq. R.

Broadcast Application Volume and Application Method. Miss required-entered of product in a quantity-of-water sufficient is-uniformly-lived error. Lice-a-minimum of 2 gallons of vacer per 1000 square feet. To echieve optimum control, inrigate treated are in order to incorporate treatment into upper level of soil. May be applied and incorporated into-flowerbed eat before plasting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was robard and diluted unless such under dealing will not result in an application rate in

### Ornamental Pasts Controlled by Broadcast Application

White grub larvae euch as Jegenese beste larven, Chelter, Phydiphiago opp., Adalfa garde baste, Oriental basta

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Sell Drench Volume and Application Method for Shrubs Mix the calculated amount or ARBORTHOR WP in the emount of water detailmined to be adequate for the solution to be adequately dispersed. Apply solutions of a rate of no feas than 10 gailtons per 1000 square feet around the base of the athuru. If present, remove any barrier to the movement of the solution into the soil such as a pleasic vapor barrier. I SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL Deleted: TURFTHOR PESTS ARBORTHOR WP. applied as a soil dranch or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are parential plants that will not produce a harvestable agricultural commodity within the next 12 months. ARBORTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes. Deleted: TURFTHOR ATTENTION Do not graze transact acess or use clippings from tracted press for food or forage. Deleted: TURFTHOR old application to aress in which panetration to the root zeno is unlikely to occur such as the last are waterlogged, soursted for income. ARBORTHOR WP is a systemic insecticide meaning it will be treathorsted by the plant's vascular system from the roots up into the body of the plant. This means optimum Deleted: TURFTHOR ..... IMPORTANT READ BEFORE USE effectiveness of ARBORTHOR WP is regarded when ARBORTHOR WP is a spelled on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining ARBORTHOR WP yeth a nitrogen containing legislate may accelerate or otherwise enhances the uptake of the active legislater into the plant. Deleted: TURFTHOR NOTICE: Read the entire Directions for Use, Conditions of Sale, Discissiver of Warranties and Umitations of Usellife Salerie buying or using this product. If the terms are nacceptable, return the product at once, unspend, and the purchase price will be retunded. Deleted: TURFTHOR Translensition of well-directes applications made to woody stemmed plants can be up to 60 days. Oplimum levels of centrol are realized when applications are sufficiently prior to articipated pasts infestations. CONDITIONS OF SALE: The Directions for Use of this product are believed to be set and must be fedowed carefully. However, because of meaner of use and other feature the control of Ensystea III, Inc., it is impossible for Ensystea III the elements off risks asso with the use of this product such as heeffectiveness or unintended consequences. All risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystantial the assumed by Buyer and User, and Buyer and User agree to hold Ensystantial Part (1998). If the product sales is the product assumed by Buyer and User, and Buyer and User agree to hold Ensystantial Part (1998). If the product sales is the product assumed by the product sales and the product assumed the product assumed to Deleted: TURFTHOR Applications to trees for the control of existing borer infestations may not prevent the eventual tose of the tree due to existing damage stready coursed by the post and stress to the tree coursel by the post infestation. harmises for any claims relating to such figthers.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable forms, selfer warrants that this product continues to the chemical description on the label and is ressonably in for the purposes stated on the Discations for Lise within used in accordance with the Directions for Lise under content conditions of use. RINSYSTEX III IMAKES NO WARRANTIES OF MERCHANTABLITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR USED OF MERCHANTABLITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR USE OF THIS PRODUCT THAT EXTEND SEYOND THE STATEMENTS MADE ON THIS LASEL. Any warranties, express or implied, having been made are inapplicable if this product has been used continuy to label instructions, under abnormal conditions or under conditions or transpendy brespensible by jor beyond the control of selfer or Enzytess its into, self-byen assembles the relative type. **Application Sites** Approximations drawn for use on enzimental plants including but not limited to trees (including non-bearing fruit and nut trees), shriubs, evergreens, flowers, ground covers, bedding plants and follage plants. Permitted attes include but are not limited to landscapes, tovests (public and private), consuments) agridens, parts, leaves, grounds, golf courses and inlation plantscapes at enti-around residences including motificant, commercial, office and shopping buildings and complictus; recreational execut, phayporunds, abhiete falds, golf courses, cometeries, sirports and parks, public and private wooded and forested areas. Application Preparation ARBORTHOR WP can be made with other insecticions, miscises, hyogicions and facilizers. Policy the label directions of all the products mixed, making ears not to exceed the takeled application rate of any individual product in the mixture. Any tank mixture that has not bean bested before as hould be located before all scales use by fart mixing a small quentity of the mixture to ensure there is no physical or chemical incompatibility. Deleted: TURFTHOR LIMITATIONS OF LIABILITY: To the state consistent with applicable law, Ensystex III shall not be liable for any facilitation, or appealed demagns resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OF BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAMB, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAMS BASED ON BREACH OF MAYARRANTY, CONTRACT, NEGLICIONES, TORT, STRICT LIABILITY OF OTHERWISE), REBULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT. If necessary, consult resources in horticulture in your gree (such as your Conparative Extension Bervice) to determine appropriate application timing. Ornamental Pests Controlled by Soil Injection or Drench Application Adelgids, Aphiles, Ammere scales (suppression), Slack vine week larves, Emerald esh horer Sueshythus longhormed borer, Flatheeded beners (including brouze birch borer and sider borer Japenese basties, Lace bugs, Leef beetes (including aim and viburium leaf beetes) Leafleppers (circluding glessy-relinged sharphonotes), Leaf miners, Mestybugs, Pine dig mot larves, Psyllids, Rayal palm bugs, Sawily larves, Soft soeles, Thirps (suppression only), White grub larves, Whitefiles. This Canditions of Sale and Umbation of Warranty and Usblity may not be amended by any oral or written agreement. ARRORTHOR IS A resistered trademark of Engister IV. Inc. Deleted: TURFTHOR Soil Injection for Trees Soil Injection is not allowed in Nassau and Suffolk Counties of New York Sail Injection Use Rate for Trees Use Rate Table for ARBORTHOS WP for Sail Injection for Years Deleted: TURFTHOR 1.8 guitant (Y similar) per 24 to 48 Inches of cumulative front diam Soil Injection Volume and Application Method for Trees Some representative veneme anni reprincation meterior for 2 research profes determined to be adequated in the treatment of <u>ARROSTHOR</u> MP in the proposed of profes determined to be adequately disposed. Apply at a low president administration one of the two following methods. Make a minimum, of a lajentian hanks per tree. For optimum controls, maintain a high level of sell consisters in the begind one for T to 10 days after Deleted: TURFTHOR Grid injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil he tree's branches/follage out to the tree's branches/follage out to the tree's brig line. Besal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree. Soil Drench for Trees Soil Drench Use Rate for Trees Use Rate Table for ARBORTHOR WP for Boll Drench for Trees. Deleted: TURFTHOR 1,6 numers (1 packet) per 24 to 48 leates of completive track diameter Self Urench Volutine and Application Method for Trees
Mix the catestated amount of <u>ADDORTHON</u> WIP in the amount of water determined to be adequate for the southon to be adequately dispursed. Apply single at size of no less than 10 gallons per 1000 operer feed errored the bear of the tree. If present, remove any benter to the movement of this belief in the the contract of the bear of the tree. If present, remove any benter to the movement of this belief in the the contract of the bear of the tree. Deleted: TURFTHOR Soil Injection for Shrubs Soil injection to not allowed in Nassau and Suffelk Counties of New York Soil Injection Use Rate for Shruba Use flate Table for ARBORTHOR WP for Sail injection for Shrubs Deleted: TURFTHOR 1.4 conses (1 pecket) per 24 to 46 consisting 6, of shock height Boll injection Volume and Application Mathed for Shrubs life the calculated amount of <u>ASECRIPOR</u> WP in the emount of year, determined to be adequate for the treatment to be edecudiny dispersed. Apply at a tem pressure metrog a reinforce of a figuration below per struct. For opinions central, maintain a high level of sell moleture in the treated erea for 7 to 10 days after treatment. Deleted: TURFTHOR Soil Drench for Shrubs Soil Drench Use Rate for Shrubs Use Rate Takin for ARBORTHOR WP for Self Drench for Stroke Deleted: TURFTHOR 1.6 outces (1 packet) per 24 to 46 aumidative ft. of shrub height

# PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332 Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

February 15, 2007

### COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Submission of Certification with Respect to Citation of Data

Dear Ms. Eagle,

On behalf of Ensystex III, Inc, please find the enclosed documents:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. Completed Certification with Respect to Citation of Data
- 3. Letter of Authorization

Ensystex III apologizes for not providing this Certification earlier, but because the registration was granted several months earlier than expected and because Ensystex III was not provided notice in advance of the registration, we were unable to provide it earlier.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex III, Inc.

Please read instructions on	reverse before completin	g form.	Form Ap	oroved	. OMB No. 20	70-0060	Approval expires 2-28-95	
<b>≎EPA</b>	Unit Environmental F Washingt	ency	✓	Registrat Amendm Other		OPP Identifier Number		
	A	pplication for	Pesticide - Sec	tion	l			
1. Company/Product Number 82957-3			Z. EPA Product Manager     V. Eagle				posed Classification  None Restricted	
4. Company/Product (Name) Ensystex III, Inc. / Turfi			PM# 1					
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor. WA 98332 Check if this is a new address			6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No.					
		Con	Product Name _			-		
Amendment - Explain  Resubmission in resp  Notification - Explain  Explanation: Use addition	below.	ted Nov. 2, 2006	Final printed Agency lett "Me Too" A  Other - Exp	er det Applica	ition.	to .		
Submission of Certification w	ith Respect to Citation of C	oata.						
		Sec	tion - III					
1. Material This Product Will	Be Packaged In:							
Child-Resistant Packaging Yes No	eging Unit Packaging Yes No		Soluble Packaging Yes No	Metal Plastic Glass		Metal Plastic		
* Certification must be submitted	If "Yes"       Unit Packaging wgt.	No. per lif "Yes container Peckar	" No, per ge wgt container			Other (Sp	pecify)	
3. Location of Net Contents  Label C	Information 4.	Size(s) Retail Contai	ner	5. Loc	On Label On Labeling ac			
6. Manner in Which Label is	Affixed to Product	Lithograph Paper glued Stenciled	Other					
Section - IV								
1. Contact Point (Complete	items directly below for i	dentification of indivi	dual to be contacted, i	if nece	ssary, to proc	ess this e	application.)	
Name Michael Kellogg		Title Agent				elephone 253) 85	No. (Include Area Code) 3-7369	
f certify that the stater I acknowledge that and both under applicable I	Certification s form end all attach leading statement m	ments thereto are true by be punishable by fir	, ecou	rate and comp mprisonment c	lete.	6. Date Application Received (Stamped)		
2. Signature  Minhau Many			ent					
4. Typed Name Michael Kellogg		5. Date	15/07					



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to; Director, OPPE information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.	I M Street, S.YV., W	vashington, OC 20460.			
Certification with Respec	t to Citation of	Data			
Applicant's/Registrant's Name, Address, and Telephone Number Ensystex III, Inc.; 2709 Breezewood Avenue; Fayetteville, NC 28303		EPA Registration Number/File Symbol 82957-3			
Active Ingredient(s) and/or representative test compound(s) imidacloprid		Date February 16, 2007			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Terrestrial Nonfood, domestic outdoor	3)	Product Name Turfther WP			
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator)	ed product labeled fi n 8570-27).	or all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	ent offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	PORT (Check one n	nethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	a list of companies sent offers of compensation (the Data Matrix form under the selective method), and have included with the				
SECTION II: GENERAL	OFFER TO PAY				
I hereby offer and agree to pay compensation, to other persons, with regard to SECTION III: CERT		s application, to the extent required by him two.			
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-in response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application souguses.	addition, if the cite- t (1) concern the pro- is a type of data that ght the initial registra	all option or cite-all option under the selective method is operties or effects of this product or an identical or it would be required to be submitted under the data ation of a product of identical or similar composition and			
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, the	at I am the original data submitter or that I have obtained			
I certify that for each study cited in support of this registration or reregistratic submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be paid for the use of the study.	study in support of the law of th	his application; (c) all periods of eligibility for iting the company that submitted the study and have nd (ii) to commence negotiations to determine the			
I certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	ne submitted to the and to deny, cancel or	Agency upon request. Should I fall to produce such suspend the registration of my product in conformity with			
i certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or imprisor	ents to it are true, nment or both und	accurate, and complete. I acknowledge that any der applicable law.			
Signature Michael Sollang	Date 2/15/07	Typed or Printed Name and Title Michael Kellogg; Agent			

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fex - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (\*FIFRA\*), 7 U.S.C. § 136 et seq. and state law.

Stackley, Notany Public

If you have any questions, please do not hesitate to contact me.

Sincerely

David Nimocks Chairman

> NOTARY PUBLIC

cc: Pyxis Regulatory Consulting, Inc.

Notary

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 3 1 2007

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Michael Kellogg, Agent Etigra c/o Pyxis Regulatory Consulting, Inc. 4110 136 St. NW Gig Harbor, WA 98332

SUBJECT:

Application for Pesticide Notification (PRN 98-10)

Request Alternate Brand Name "Arborthor WSP"

EPA Reg. No.82957-3

Application Dated January 10, 2007

Dear: Mr. Kellogg,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 01/10/2007 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely, Rachel C. Holloman

Linda Arrington

Notifications & Minor Formulations Team Leader

Registration Division (7505P) Office of Pesticide Programs



# ARBORTHOR WSP

For follar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By WL
imidacloprid	78.0%
Other Ingredients:	28.0%
TOTAL:	100.0%
and the state of t	ahr hadaan

teep water soluble packets in outer container until immediat se. Store in a cool, dry piace but not below freezing (32°F). EPA Reg. No. 82967-3 EPA Est. 81824-NC-001

STOP - Read the label before use KEEP OUT OF REACH OF CHILDREN

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasts que la eliqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-6467) or visit www.for-thor.com.

**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

	FIRST AID
W serollowed	Call palson control senter or doctor invendrishing for treatment solvice.     Hence person stip a glass of water if able to meeting the control of the palson workers anishe or doctor.     Do not induce varieting unless told to do so by the palson workers existe or doctor.     Do not gone enything to an unconscious person.
If an olin or clothing	Take off conteminated clothing. Rene state investigately with planty of water for 16 to 20 sensition. Call a polson central center or dester for treatment advice.
If in eyes	<ul> <li>Hold eye open and tince clowly and gendy with water for 15 to 20 minutes.</li> <li>Resource context lonses, if precent, other the tint 6 minutes, tion continue rineing eye.</li> <li>Cell a polsen custod center or destor for instrument advice.</li> </ul>
	HOTLINE NUMBER
Have the product o or going for treatm treatment informati	onfainer or tubel with you when outling a polace control center or doctor end. You may also content 1-(865)-367-6467 for emergency medical or.
7744575	NOTE TO PHYSICIAN

PRECAUTIONARY STATEMENTS

Hazarda to Humana and Domestic Animals.

#### DIRECTIONS FOR USE

of Law to use this product in a manner in the far requirements opening to that justicidate

Not for use on bearing fruit or nut trees. Do not apply through an impation system

Deleted: TURFTHOR

Deleted: TURFTHOR

#### STORAGE AND DISPOSAL

reter, load or feed by storage or disposal.

Pasticide Storage: Keep out of reach of children and enimals. Store in original containers cely. Store in a ced (but not below treating (22°F), day place and evold stores heat. Hendile and open container in a manner so as in prevent spillage. Do not put concentrate or dilute material into feed or drivix containers. Proferably store in a tocked

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not out the water soluble packets when opening container.

Pasticide Disposal: Waster resulting from the use of this product may be disposed of on alle or at an approved waste disposal facility.

Container Disposet Triple time (or equivalent). Then offer for recycling or recentificating, or purcture and dispose of in a sanitary lendfill or by incineration, or if allowed by state and local authorities, by burning, if burned, stay out of smote.

to Case of Spills: Confine It, avaid contact, legists area and keep animals and unprotected persons away. If uplit is liquid, form dike around uplit area and/or absorb spill with absorber the animal state of the s

#### DILUTION AND MIXING OF ARBORTHOR WSP

Each ARBORTHOR WSP outer container pantains a number of clear writer soluble packets. Do not ellow the packets to become writ at any time before putting them into a spray tent at the time of intended missing. Handling the packets with vert hands or givers or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left

To mits, open the outer container and remove the required number of unopened pa needed for the gallon amount of solution to be mixed. Drop the required number of pa into the carry tank as it is being filled with water with the agilitator operating. The slapsed until the packets are fully dissolved depends on the degree of egitation and the temperati the water with more time needed for tower levels or agilitation and the temperating of the packets are fully dissolved. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Aveil using ARIGISTICS WEP process in takin also containing products that contain horse or tree chlorine. The practic molerial may reset with the borne or chlorine to form a non-water soubtle compound instead of disastiving into the vaster. However chlorinets with the acceptable and will not cause this compound to form or reaction to occur. Secure the practical service exceptable and will not cause this compound to form or reaction to occur. Secures the practicular service exceptable in water but not oil, do not alternate to use peaclets in disead of or number

#### APPLICATION FOR TURE PESTS

ARBORTHOR WSP controls or suppresent a wide range of sell inhebiting jurgrass insect pasts. ARBORTHOR WSP is not for use on turipless grown for sale (sed farms), commercial seed production or for research.

#### Application Sites

itted sites include but are not limited to lewns, grounds and landscapes at and/o ences including multi-unit, commercial, office and shepping buildings and co ational press, playgrounds, athlatic fields, golf courses, cometeries, sirports and p

#### **Application Timing**

Application: I mining in ARBORTHOR WSP, imidiatioprid, has sufficiently long-leating residual activity that applications can be made prior to egg isying by the target peetig. Optimize control of turn peet will be echieved when application is made prior to egg patch followed by sufficient irrigation or rainfall to move the active logradient through the thatch and down into the underlying soil. Applications can be timed based on past superiences at the sid or at the creat, current results of adult monitoring/trapping or other methods.

if necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optimum central is echieved if irrigation or reinfall occurs within 24 hours after application. Unitarrity of application may be advantally affected if burl is moved prior to irrigation/rainfall.

#### **Application Precautions and Preparations**

Keep children and pets off trested areas until spray has dried.

Application should not be made to turt that is frozen, watertogged or is saturated with water. Turt is this condition will not allow the necessary varical distribution of the active ingredient down into the sell.

CHROSTHOR WEP can be mixed with pither inspetiables, milliples (unprisides and fortilizers. Follow the label directions of all the products mitted, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tenk mixture that has not been leated before should be tested before full scale use by first mixing a small quantity of the mixture to examen there is no physical or otherwise incomplishing.

#### **Application Equipment and Methods**

Apply the Indicated amount ARBONTHOR WSP mixed in a volume of writer sufficient to edequately distribute the active ingredient to the target area(s). Apply ABONTHOR WSP couldon se agency of uniform, comere droplets at a pressure low enough to eliminate offit from the target area. Properly calibrated application equipment must be used to apply the larget area. Properly call ARRORTHOR WSP. Turi Application Use Rates

Use Rel	e Table for ARBORTHOR WSP for Turf Applications
Usa Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.
В	1.6 ounces (1 packet) per 8,250 sq. ft.

#### **Turf Application Volumes**

The calculated amount of <u>ARRENTHICIR</u> WRP sen by applied in only yellow, it water as Jens as the mealment label rate is not exceeded. Do not exceed the mealment habel rate is not exceed the mealment habel rate by applying substant to an area smaller than intended when it was mixed and disuled unless such under design will not easifi in an application rate in senses at the mealment habel rate.

#### Turf Pasts Grouped by Use Rates

Use Rale A: Lervee of Annual bluggrass weevil, Asiete gerden besits, terfgrass etsenbas, Culverms (suppression crity). European chaffer, European Green June besits, Japanese basits, Northern meeked chaffer, Criental besits, spp., Seuthern mesked chaffer.

Use Rese B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, bilibugs, ennuel bluegrass weevil and European cross fly: Optimum control is obtained when application is made prior to agg hatch.

Chinch buge: To maximize suppression, make application prior to the teach of the first instar

Moto cricisets: Make application prior to or during the period of peak egy hetch. Apply on solutiods in conjunction with <u>APERTITION WIPP</u> if pfulls or large nymphy ere present end ... Lunnings at the firm of application.

#### FOLIAR AND BROADCAST APPLICATION FOR **ORNAMENTAL PESTS**

ARBORTHOR WEP, applied to follege and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), abrulia, evergreens, flowers, follege plants, ground covers and interior plantscapes. Non-bearing trees are personal plants that will not produce a harvestable agricultural convencity within the next 12 months. ARRIGITION WWF is not in use on plants being grown for sale, full, out or commercial seed production or for research purposes.

ARROTHER WSP is a systemic insecticide meaning it will be translocated by the glant's visicular system from the roots up into the body of the plant. This means optimize effectiveness of ARROTHEROR WSP is resided on expensive providing portion of the plant from which it can be translocated to other parts of the plant. Combining ARROTHEROR WSP with a nitrogen certaining facilities may appelent or otherwise enhance the uptake of the active ingredient into the plant.

Translosation of soil directed applications made to weekly stemmed plants can be di up to 60 days. Optimum levels of control are restized when applications are p sufficiently prior to articipated peats infestistions.

#### **Application Sites**

For use on ornamental plants including but not limited to trees (including non-bearing truit and not-brees), -shrubin, -neergreens, -liowest-, -graund-sanwith, -bedding -plants--mot-foliage-plants-. Perceited sites include but are not limited to tendecapes, forests (public and private), ornamental gardens, parks, terms, prounds, gelf courses and interfor plantscapes at entitle around residences including multi-unit, commercial, office and shopping buildings and complexes, recressionel eres, playgocounts, striketic fields, golf courses, cometeries, sirports and parks, public and private wooded and forested stress.

#### **Application Preparation**

ARROTTION WIF cas he miss with other in pricises, missises involves and isolities. Follow the label discriben, or eit the postures much making sure, not to supped the labeled application rate of any individual product in the missise. Any tenk induce that has not been tested before should be tested before full scale use by fest missing a small quentity of the missises have there in physical or chemical incompositibility.

necessary, cancell resources in horizoiture in your area (such as your Cooperative intension Service) to determine appropriate application timing.

#### Foliar Application

Foliar application of ARBORTHOR WSP others local systemic activity segment insect posts.

Applications to payed with find to vice relating sides at \$500, field by \$0.004 64 \(\frac{1}{2}\) pied by

complexition with a payment of the first to the first of the first

#### Ornamental Application to Centrol Anta

ARRORTHOR WEP can be used to indirectly control and, when applied to control ophide, scale insents, mealybugs and other sucting insents on arramentals thereby limiting the

#### Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformity well foliops. All required emount of ARRORTHOR WEP (from the table below) in that quantity of water, "Again treatments prior to establishment of high peel populations. Reapply as needed.

## Mixing Table for ARBORTHOR WSP for Foller Applications 1,5 ounces (1 pecket) per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application Adeigids, Aphids, Japanese basties, Lane bugs, Leef bestles (including olm and viburnum loof bestles). Leefhoppers (including glessy-winged sharpsheder), Meelybugs, Psyllids, Sawbylarves, Thrips (suppression), Whitefiles.

## Broadcast Application-----

Broadcast Application Use Rate

Use Rate Takin for ARBORTHOR WSP for Breadcast Applications 1.6 ounces (1 packet) per 8,250 to 11,000 eq. ft.

#### Broadcast Application Volume and Application Method

Mix required-amount of predict is a quantity-of-water sufficient-to-unformly-treat-area. Lise-o-minimum of 2 gations of water per 1000 square feet. To achieve optimum control, infigate transfer area in order to incorporate insattment into upper level of soil. May be applied and incorporated-into-flowerhead soil before-planting.

Do not exceed the maximum label rate by applying solution to an erea smaller than intended when it was mixed and diluted unless such under dealing will not result in an application rate in accesses of the maximum failed rate:

#### Ornamental Pasts Controlled by Breadcast Application

White grub terves such as Japanese beatle larves, Chaffers, Phyliophage spp., Asiatic gard beatle, Oriental beatle

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t-management of the second	Soil Grench Volume and Application Method for Shrubs	
SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS	Mits the calculated amount of ARROSTINGS WIRP is the arround of visitor do	Deleted: TURFTHOR
ABBOSTHOR WRP, explined pole and disposition politication, controls a wide regree of invects on treat (instituting nine-learning that and nucl treat, shrubs, evergreens, fouriers, foliage plants, ground covers code finished perfectiones. Non-bearing treat are a personal plants that it will be produce a horizontal explicit plant of the region produce a horizontal explicit plant of the region is not fire use on plants being ground for calls, incl., not or conversable sould production of fair	to the recovered of the solution into the soil such as a please vaper barrier.  ATTENTION	Deleted: TURFTHOR
	Do not grate treated screen truto ofgoings from treated screen for fixed or forage.  Availd named or pudding of Intertain water following application.	Deleted: TURFTHOR
ARROTTION WEP is a systemic insectionic meeting if will be translocated by the plant's vescular system from the roots up into the body of the plant. This means optimize official vesses of ARROSTION WEP is represent young ARROSTION WEP in specified upon growing portion of the plant from which it can be translocated to other parts of the plant. Combining ARROSTION WEP with a nitrogen containing legislate, recy accelerate pt otherwise orthogen the uptate of the policy legislate of the solve logislate of the top the solve logislate of the top the plant.	Avaid application to erect in which peneiration to the root zone is untilluly to soon each as erection are waterlegged, saturated for houses.	Deleted: TURFTHOR
effectiveness of AMBORTHOS WAP is resized when AMBORTHOS WAP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant.	IMPORTANT READ BEFORE USE	Deleted: TURFTHOR
Combining ARBORTHOR WISP with a nitrogen containing legislate may accelerate of otherwise enhance the uptake of the softwalling added into the plant.	NOTICE: Read the entire Directions for Use, Conditions of Bale. Disclaimer of Wormships and Uminipalities of Disclaims Select Supplies or valving this product. If the farms are not acceptable, catum the product of sone, unopreved, end the profuses price will be refunded.	Deleted: TURFTHOR
Transingation of soil directed applications made to woody stammed plants can be dislayed by up to 60 days. Optimum levels of central are realized when applications are parterned confliciently print to entiliplated parts infrastictions.  Applications to trees for the central of existing borer infestitions may not prevent the eventual.	CONDITIONS OF SALE: The Directions for Use of this product are believed to be seequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Engystes III. (i.e., it, is impassible for Engystes III to all rules associated with the use of this product such as ineffectiveness or unintended consequences. All such	Deleted: TURFTHOR
tess of the tree due to easting damage already opused by the pest said stress to the tree quased by the pest infectation.  Application Sites  For use on commenced plants including but not briefled to tree (including non-braining field and not trees) should be proposed to the performance of the pe	risks shall be easumed by Buyer and User, and Buyer and User agree to hold Ensystex III harveless for any claims relating to such factors.	-
Per use on enremental plants including but not limited to trees (including non-bracing fruit and nut trees), shrubs, vergreens, flowers, ground convers, bodding plants and loitage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, items, grounds, golf ocurses and interior plantscapes at and/or around residences including midS-unit, commental, office and shopping buildings and completes, represental errae, ployyrounds, ethicits fields, golf courses, convectories, although and private wooded and lorested errees.  Application Preparation	DISCLAIMER OF WARRANTRES: To the extent consistent with applicable fewe, selfer vermants but this product centiforms to the chemical description on the table and is reasonably it for the purposes stated on the Directions for Use when sade in econorate with the Directions for Use under normal conditions of use. EMPSTEX IS MAKES NO WARRANTIES OF MERCHANTASHLY OR OF FITNESS FOR A PARTICULAR PURPOSE. NOR ANY OTHER EXPRESS OR MEYED WARRANTIES WITH REPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND SETVIND THE STATEMENTS MADE ON THIS LABEL. Any watersides, capress or implied, harving been made at inapplicable if this product has been used contray to label includions, under achormal conditions or under conditions not reasonably foreseeable by the bryond the control of) selfer or Express its firm, and buyer essential for the product has been used contray to table increasing.	4.419
ARROGITHOR Y/NO year has he mixed with other insectionies, militates. Arrivations of infiltrates. Follow the label directions of all the products make, making our not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been casted factors about to be taked before a few seals of the product of the mixture	LIMITATIONS OF LIABRATY: To the extent consistent with applicable law, Ensystex 81 shall not be liable for any institution, consequential or special demages resulting from the use or better the English Constitution of the cons	Deleted: TURFTHOR
If nocessary, consult resources in herdesture in your cree (such se your Cooperative Estension Bervice) to determine apprepriets application Brings.  Ornamental Peasts Controlled by Soil Injection or Drench Application Adelgiss, Aphids, Ammeré soiles (suppression), Maks vine vecell saves, Emaraté ceb brev, Bueslightes insplanmed bezet, Pfaltheaded between Confession persons beaftes, Lace bugs, Leaf feedes (building site and viberaum lacif bedee), Leathingpare (including glassy-viringed charpshoeter), Leaf miners, Medifytugs, Pine tip moth laves, Psylvide, Reyal pain bugs, Sevilly laves, Soil teates, Tivipe (suppression only). White	EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER POR ANY AND ALL CLAIMS, LOSSES, REQUESES ON DAMAGES IN CALLDRING CLAIMS BASED ON EXEACH OF WARRUNTY, CONTRACT, REGULGENCE, TORT, STRICE LLABOLITY OR OTHERWISE; RESULTING FROM THE USE OR HANDLING OF THE PRODUCT, SHALL SE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IN THE REPLACEMENT OF THE PRODUCT. This Conditions of Spin and Limitation of Wermanly and Liability may not be amended by any scal or written agreement.	
prob arrays, Whitefiles.  Soil Injection for Trees  Soil Injection for Trees  Soil Injection to not allored in Nessau and Suffall, Countles of New York  Roil Injection Use Rate for Trees	ARRORITION Is a registered transport of Country, U. Iro.  Revised USD7	Deleted: TURFTHOR
Use Raia Table her APROPRIED WAP her Soil legention for Trees  1.6 sunces (1 posset) per 24 to 45 mines of carrolative Yunk diameter  Soil Injection Volume and Application Mathod for Trees	***************************************	Deleted: TURFTHOR
With calculated amount of <u>APRICATIONS</u> WIPD in the amount of under department to be adequate for the treatment to be adequately departed. Apply at a low pressure excepting to one of the the following motions. Make a reliable in the project of the property of control, regarders a high level of and mainture in the treated was for 7 to 10 days after Yealthmen.		Deleted: TURFTHOR
Orld injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath that is branchesfallage and to the treath step that.  Beast injectors: Evenly space injection holes around the base of the tree no mere than 12 incluse out from the tree.  Soil Orench for Trees  Soil Dranch Use Rate for Trees		
Use State Table for ARBORITHOS WIP for Bull Dranch Ser Trans 1 6 minutes (1 panel) per 24 to 48 minutes of myrministra Syrvit Standard		Deleted: TURFTHOR
Soil Oranch Volume and Application Method for Treas Mx the catalistic from mount of <u>Application Method for Treas</u> With in the solution is the <u>Enteropy of the Enteropy of the Enteropy of the Solution in th</u>		Deleted: TURFTHOR
Solf Injection for Shrubs bell injection is not allowed in Nesseu and Buffolk Counties of New York Bolf Injection Use Rate for Shrubs		
Use that Table for ASSIGNTHON WIF for Soil Ispection for Windle  1.6 current (T pessel) per 24 to 48 controller R. of shrub height Soil Injection Violume and Application Mathod for Shrubs		Deleted: TURFTHOR
to the calculated amount of #ARCOSTECOS VISO in the amount of major deformined in the depends for the treatment to be adequately depended. Apply of a tree pressure making a sentrum of a lipsocon halos para strikus. For explanant control, maintain a high level of soft markers in the treatme area for 7 to 10 days after treatment.		Deleted: TURFTHOR
Soil Drench for Shrube Soil Drench Use Rate for Shrube		TIPETUAN
Main Natio Table (on ARRESTED WIF for Sell Drovets for Strates	***************************************	Deleted: TURFTHOR

Please read instructions	on reverse before compl	letin Jrm.	Fo	orm Approved	d. No. 207	0-0060.	Approval	xpires 2-28-
<b>⊕EPA</b>	Environmenta	United States BI Protecti hington, DC 20		1	Registration Amendment Other	211	OPP Identifi	ier Number
		Applicati	on for Pesticide -	Section				
1. Company/Product Nut 82957-3	mber		2. EPA Produ V. Eagle	ct Menager			osed Classi	fication Restricted
4. Company/Product (Na			PM#	4		1 W		Kestricted
Ensystex III, Inc. / T	Applicant (Include ZIP C							
Ensystex III, Inc. c/o Pyxis Regulatory 4110 136th St. NW Gig Harbor, WA 983	Consulting, Inc.		(b)(i), my pro	No.	In accordance lar or identical	in comp	position an	
			Section - II	31119				
Notification - Exp  Explanation: Use add  Notification of the add  consistent with the pro- labeling or the confider false statement to EP/	response to Agency letter lein below.  itional page(s) if necessarition of an alternate brain visions of PR Notice 98 antial statement of formula. I further understand a violation of FIFRA and will be Packaged in:  g  Unit Packaging  Yes No	ry. (For section of name per Fig. 10 and EPA alla of this proof that if this noting I may be subj	Ager "Me Other on I and Section II.)  PRN 98-10. The alternar regulations at 40 CFR 1 duct. I understand that it iffication is not consistent fect to enforcement action.  Section - III  Water Soluble Package Yee No	te brand nam 52.46, and not with the terms and penalt	tion.  The is "Arborthor of the change of 18 U.S.C. Sons of PR Notice ies under section of the change of the chang	WSP". es have b Sec. 100° 98-10 a ons 12 a	een made 1 to willfully and 40 CFF nd 14 of FI	to the make any R 152.46,
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6. Manner in Which Labe	Conteiner It is Affixed to Product	Lithog Paper Stane	graph glued	Other	On Labeling acco	panying p		•
			Section - IV					
1. Contect Point (Compi	lete items directly below	for identification	on of individual to be cont	acted, if nece	ssary, to proces	s this ap	plication.)	
Name Michael Kellogg		r	Title Agent			phone N 53) 953-	o. [[nclude. 7369	Area Code)
I certify that the st I ecknowledge the both under applica	t any knowlingly false or	Certifica this form and misleading sto	etion   all attechments thereto a stement may be punishable	ere true, accur le by fine or in	nprisonment or	£.c.	Data Appli Received Starn	
2. Signature  ///	sooneg		3. Title Agent				ر د د د د د د د د	
4. Typed Name Michael Kellogg	//		5. Date					

# PYXIS REGULATORY CONSULTING, THE

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332 Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

January 10, 2007

## **COURIER DELIVERY**

Venus Eagle (PM1)
Document Processing Desk (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. - Turfthor WP (EPA Reg. No. 82957-3) Notification of an Alternate Brand Name per PRN 98-10

Dear Ms. Eagle,

On behalf of Ensystex III, Inc., please find the enclosed notification of an alternate brand name for Turfthor WP (EPA Reg. No. 82957-3). The alternate brand name is "Arborthor WSP".

In support of this notification, please find the following:

- 1. Application for Pesticide Registration (EPA Form 8570-1)
- 2. One (1) copy of the Arborthor WSP label with changes tracked.
- 3. One (1) copy of the Arborthor WSP label with changes incorporated
- 4. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Regards,

Michael Kellogg

Enclosures

cc: David Nimocks, Ensystex III, Inc.

4110 136<sup>th</sup> St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

January 10, 2007

#### COURIER DELIVERY

Venus Eagle (PM1)
Document Processing Desk (FNL LBL)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-3)
Submission of Final Product Labeling per the Agency Letter dated November 2, 2006

Dear Ms. Eagle,

On behalf of Ensystex III, Inc., please find the enclosed final labeling for Turfthor WP (EPA Reg. No. 82957-3) per the Agency letter dated November 2, 2006.

In support of this submission, enclosed are the following documents:

- 1. Application for Pesticide Registration (EPA Form 8570-1)
- 2. Two (2) copies of the Turfthor WP final label
- 3. Letter of Authorization

Please feel free to contact me if you have any questions or need any additional information.

Regards.

Michael Kellogg

Enclosures

cc: David Nimocks, Ensystex III, Inc.

Please read Instructions of	reverse before compl	eting form.		Form Ar	proved	OMB No. 2	2070-000	30. Approval expires 2-28
<b>\$EPA</b>	Environmenta	United States al Protecti lington, DC 20			1	Registra Amenda Other		OPP Identifier Number
		<b>Applicati</b>	on for Pestic	de - Sec	tion			
1. Company/Product Numb 82957-3	<b>e</b> r		2. EPA V. Ea	Product Mar	reger		3, P	roposed Classification  None Restricted
I. Company/Product (Name Ensystex III, Inc. / Tur			PM#		1			none nesulota
5. Name and Address of A Ensystex III, Inc. c/o Pyxis Regulatory C 4110 136th St. NW Gig Harbor, WA 98332	onsulting, Inc.	ode)	(b)(i), r to: EPA I	Reg. No	is sim		-	r FIFRA Section 3(c)(3) emposition and labeling
			Section -	16				
Amendment - Explain Resubmission in resubmission - Explain	panse to Agency letter	r dated		Final printe Agency let "Me Too"	ter date Applica	tion.	to 11	/2/2006
l. Material Thie Product Wi	Il Be Packaged In:		Section - I					
child-Resistant Peckaging Yes No	Unit Packaging Yes No		Water Soluble P Yes No	sckaging		2. Type of C	Metal Metal Plastic Glass	
Certification must e submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container			Paper Other (S	ipecify)
Label Label	Information Container	4. Size(s) Ret	tail Container		5. Loc	ation of Labe On Label On Labeling e		
Manner in Which Label is	Affixed to Product	Lithog Paper Stence	raph glued iled	Other				
			Section - I\					
Contact Point (Complete	items directly below f	or identificatio	n of individual to be	contected,	W nece	sary, to proc	ess this	application.)
me lichael Kellogg			Title Agent					No. (Include Area Code) 53-7369
	ments I have made on y knowlingly false or law.		all attachments the					6. Date Application Received (Stamped)
Signature Winhald	Dogy		3. Title Agent					
Typed Name Nichael Kellogg			5. Date					

# ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email <u>david@ensystex.com</u>

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensylex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

a Stackley, Notany Public

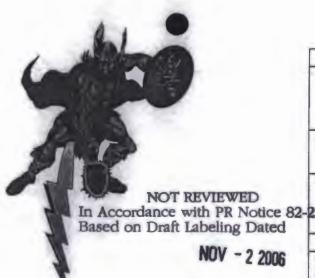
If you have any questions, please do not hesitate to contact me.

Sincerely

David Nimocks Chairman

cc: Pyxis Regulatory Consulting, Inc.

**Notary** 



# TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

<b>Active Ingre</b>	dient:	By Wt.
Imidacioprid	_ 	75.0%
Other Ingred	lients: ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	25.0%
TOTAL:	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	100.0%
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Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

## STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN

# CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III. Inc.

	FIRST AID
If ewallowed	Call potson control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not include verniting unless told to do so by the poleon control center or doctor.  Do not give anything to an unconscious person.
If on sidn or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a polson control center or doctor for treatment advice.
If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.     Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.     Cell a potson control center or doctor for treatment advice.
	HOTLINE NUMBER
Have the product of going for treatment information	ontainer or tabel with you when calling a poleon control center or doctor tent. You may also contact 1-(866)-367-8467 for emergency medical on.
	NOTE TO PHYSICIAN
No specific antidote	is available. Treat the patient symptomatically.

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

## CAUTION

Hammful if evallowed, inheled or absorbed through skin. Causes eye infistion. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-elseved shirt and long pents, chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrie rubber, neoprene nubber, natural rubber, polyethyleno polyvinylchloride (PVC) or viton and shoes plus socials (PPE). Follow menufacturer's instructions for clearing/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other taundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the tollet. Remove clothing immediately if pseticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the cutatide of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **Environmental Hazards**

This pecicide is highly took to equatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

#### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 6.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(a) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm furf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and evoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked

Exposure to moisture or excessive handling of water soluble packets can cause them to breek. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rines (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, evoid contact, leolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged peckage in a holding container and identify contents. Contact Ensystex III et 1-866-367-8467 or Chemtrec at 1-800-424-9300

### DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wat at any time before putting them into a spray tarks at time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the splitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tenics also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in desel oil or summer spray oils.

#### **APPLICATION FOR TURF PESTS**

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turigrass insect peets. TURFTHOR WP is not for use on turigrass grown for sale (sod farms), commercial seed production or for research.

#### **Application Sites**

Permitted sites include but are not limited to lawns, grounds and landscapes at end/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

The active ingredient in TURFTHOR WP, imidecloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch Glowed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is moved prior to irrigation/rainfall

### Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, mitticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixture that has not been mixture to ensure there is no physical or chemical incompatibility.

#### **Application Equipment and Methods**

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR

#### **Turf Application Use Rates**

Use R	ate Table for TURFTHOR WP for Turf Applications
Use Rate	Ounces (Packets) per 1,000 sq. feet
Α,	1.6 ounces (1 packet) per 8,250 to 11,000 eq. ft.
8	1.6 ounces (1 pecket) per 8,250 eq. ft.

#### **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum tabel rate is not exceeded. Do not exceed the maximum tabel rate by applying solution to en area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

#### **Turf Pests Grouped by Use Rates**

Use Rate A: Larvee of Annual bluegrass weevil, Asietic garden beetle, Billbug, Black turfgrass atsenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, Phyllophaga

Use Rate B: Chinch bug (suppression only), Mole Crickets

#### **Application Recommendations Against Specific Turf Pests**

Grubs, billibugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar

Mote cricitets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### FOLIAR AND BROADCAST APPLICATION FOR **ORNAMENTAL PESTS**

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vescular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of solt directed applications made to woody stammed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated peats infestations.

#### **Application Sites**

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, sirports and parks, public and private wooded and forested areas.

#### **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horiculture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

### Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect peets. Applications to plants with hard to wet foliage such as holly, pine or by should be applied in enhination with a spreader / sticker.

#### Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, meetybugs and other sucking insects on omementals thereby limiting the amount of honeydew available.

#### Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications 1.6 ounces (1 packet) per 300 gallons of water.

#### Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese besties, Lace bugs, Leef besties (including eim and vibumum leef besties), Leafhoppers (including plassy-winged sharpehooter), Mestybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whitefies.

#### **Broadcast Application**

## **Broadcast Application Use Rate**

Use Rate Table for TURFTHOR WP for Broadcast Applications 1.6 cunces (1 packet) per 8,250 to 11,000 sq. ft.

#### **Broadcast Application Volume and Application Method**

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, impate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the meximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under doeing will not result in an application rate in a of the maximum label rate

#### Ornamental Peets Controlled by Broadcast Application

White grub farves such as Japanese beetle larvee, Chafers, Phyllophaga spp., Asiatic garden

# SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil dranch or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not or use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insectlede meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other perts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest firefaction.

#### **Application Sites**

For use on ornamental plants including but not limited to trees (including non-bearing truit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private) ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at antifor around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, striketo felds, golf courses, cemeteries, altports and parks, public and private wooded and forested areas.

#### **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quentity of the mixture to ensure there is no physical or chemical incompetibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored ecales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhomed borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leef beetles (including elm and viburnum leef beetles), Leafhoppers (including glassy-winged sharpshooter), Leef miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

#### Soil Injection for Trees

Soil injection is not allowed in Nassau and Suffolk Counties of New York

#### Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soll injection for Trees

1.6 ounces (1 pecket) per 24 to 48 inches of cumulative trunk diameter

#### Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes par tree. For optimum control, malintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

#### Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

1.6 ounces (1 pecket) per 24 to 48 inches of cumulative trunk diameter

#### Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the action to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 equare feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

#### Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

#### Soll Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

#### Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

1.6 ounces (1 pecket) per 24 to 48 cumulative ft. of shrub height

#### Soil Drench Volume and Application Method for Shrubs

Mbr the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet eround the base of the shrub. If present, remove any berrier to the movement of the solution into the soil such as a plastic vapor barrier.

#### ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to creas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

#### IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex III, Inc., it is impossible for Ensystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex III harmless for any claims relating to such factors.

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DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, selfer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose stated on the Directions for Use when used in accordance with the Directions for Use when used in accordance with the Directions for Use when used in accordance with the Directions for Use when used in accordance with the Directions for Use when used in accordance with the Directions of MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably forseeable by (or beyond the control of) seller or Ensystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE). RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.

Revised 01/07



# TURFTHOR WP

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Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other ingredients:	<u>25.0%</u>
TOTAL:	100.0%

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EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

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**NET WEIGHT: As marked on container** 

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

	FIRST AID
If swallowed	Call poison control center or doctor immediately for treatment edvice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poisor control center or doctor. Do not give anything to an unconscious person.
If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
	HOTLINE NUMBER
	ontainer or label with you when calling a poleon control center or doctor ent. You may also contact 1-(866)-367-8467 for emergency medical in.
	NOTE TO PHYSICIAN

#### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

## CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye initiation. Avoid contact with skin, eyes or clothing. Avoid breething dust or vapor. Wash thoroughly with soap and water after handling and before setting, drinking, chewing gum, or using tobecco. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of any weterproof material such as benfer laminate, butyl nubber, ninitle nubber, neoprene nubber, natural nubber, polyethylene, polyethylene, polyethylene, or viton and shoes plus social (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no euch instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then week thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **Environmental Hazards**

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below treszing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The pecket meterial may reset with the boron or chlorine to form a non-water soluble compound instead of dissolving into the weter. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the peckets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer sorey oils.

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If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversally affected if turf is moved prior to irrigation/rainfall

#### **Application Precautions and Preparations**

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, weterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient m into the soil.

TURETHOR WP can be mixed with other insecticides, miticides, funcicides and fertilizers, TURFTHOR WP can be mixed with other insecticions, milicions, ningicions and renaizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

#### **Application Equipment and Methods**

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR

#### **Turf Application Use Rates**

Use Rate Table for TURFTHOR WP for Turf Applications		
Use Rate	Dunces (Packets) per 1,000 sq. feet	
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.	
В	1.6 ounces (1 packet) per 8,250 sq. ft.	

#### **Turf Application Volumes**

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

#### **Turf Pests Grouped by Use Rates**

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Bla turfgrass etsenius, Cutworms (suppression only), Europeen chefer, Europeen Crane Fly, Green June beetle, Japanese beetle, Northern masked chefer, Oriental beetle, Phyllophega spp., Southern masked chefer

Use Rate B: Chinch bug (suppression only), Mole Crickets

#### **Application Recommendations Against Specific Turf Peets**

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

#### FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is restized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 80 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated peats infestations.

#### Application Sites

For use on omamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardene, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, ommercial, office and shopping buildings and complexos, recreational areas, playgrounds, athletic fields, golf courses, cemeterlee, airports and parks, public and private wooded and forested areas.

#### Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect peets. Applications to ptents with hard to wet foliage such as holly, pine or ky should be applied in combination with a spreader / sticker.

#### Omamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

#### Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high post populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications 1.6 ounces (1 packet) per 300 gallons of water.

#### Ornamental Pests Controlled by Foliar Application

Adeigids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and vibumum leaf beetles), Leafnoppers (including glassy-winged sharpehooter), Mealybugs, Psyllids, Sawity larvae, Thrips (suppression), Whitefles.

### **Broadcast Application**

#### **Broadcast Application Use Rate**

Use Rate Table for TURFTHOR WP for Broadcast Applications

1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.

#### Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallone of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under doeing will not result in an application rate in e maximum label rate.

#### Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle lervae, Chafers, Phyllophage spp., Asiatic garden

# SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are parennial plants that will not produce a harvestable egricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vescular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fartilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

#### **Application Sites**

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lewns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletc fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

#### **Application Preparation**

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompetibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

#### Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored acates (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhomed borer, Fletheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and vibumum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mestlybugs, Pine tip moth learvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

#### Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Tracs

1.6 gunces (1 pecket) per 24 to 48 inches of cumulative trunk diameter

#### Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per free. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

#### Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

1.8 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

#### Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

#### Soil Injection for Shrubs

Soil Injection is not allowed in Nessau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

1.6 ounces (1 packet) per 24 to 45 cumulative ft. of shrub height

#### Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

1.6 ounces (1 packet) per 24 to 46 cumulative ft. of shrub height

#### Soil Drench Volume and Application Method for Shrubs

Mbr the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the strub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

#### ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

#### IMPORTANT READ BEFORE USE

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